

Staff-Student Relationship Policy:

Preventing harassment and sexual misconduct

1. Introduction and values

- 1.1. This policy sets out the University's position on personal relationships between members of staff and students with a view to preventing (sexual) harassment.
- 1.2. It is intended to ensure that staff-student relationships are founded on mutual trust, confidence and respect.
- 1.3. The policy sets out where relationships are prohibited and where they must be declared and how potential conflicts arising from personal relationships between members of staff and students are to be appropriately managed.
- 1.4. The policy does not overwrite our Conflicts of Interest Policy (which maintains precedent).

2. Purpose

- 2.1. The purpose of this policy is to protect both students and staff from the risks that may arise from personal relationships between them. The power imbalance between students and staff is such that the University has put in place controls regarding these risks, which include **strictly prohibiting certain relationships** between staff and the students with whom they directly interact.
- 2.2. The policy also establishes the procedure for members of staff to declare any personal / family relationship they may have with a student to mitigate any potential risks around the equity of treatment of students, real or perceived.

3. Legislative/regulatory context

- 3.1. This policy ensures compliance with the requirements of the Office for Students (OfS) general ongoing condition of registration, Condition E6: Harassment and Sexual Misconduct, by prohibiting intimate personal relationships between relevant

members of staff and students (as defined by the OfS and set out below).

- 3.2. The policy also highlights the legal issues in relation to students under 18 years of age and students in need of safeguarding.

4. Scope

- 4.1. This policy applies to all members of staff and all students at Queen Mary. A member of staff is taken to include anyone engaged under a contract of employment and any other worker (including a contractor) engaged to undertake direct academic responsibilities, or other direct professional services responsibilities, in relation to a student or students.

5. Definitions

- 5.1. A “**professional relationship**” (between a member of staff and a student) is defined as a member of staff who has:

- a) an assessing, supervising, tutoring, mentoring, teaching role; or
- b) a pastoral role; or
- c) a collaboration on a project for the university; or
- d) an administrative or technical support role

- 5.2. A “**personal relationship**” (between a member of staff and a student) is defined as:

- a) a family relationship (defined as a: child, parent or next of kin, spouse or partner, sibling, grandparent, or parent-in-law); or
- b) a business/commercial/financial relationship (noting that any financial connection to a student should be declared under the Standards of Business Conduct Policy and there are no further duties under this policy where there is solely a financial connection); or
- c) a friendship or connection that involves social interaction other than an intimate personal relationship (as defined below).

- 5.3. An “**intimate personal relationship**” (between a member of staff and a student) is defined as a relationship that involves one or more of the following elements:

- a) physical intimacy including isolated or repeated sexual activity; or
- b) romantic or emotional intimacy.

- 5.4. A “**relevant staff member**” means a member of staff who has direct academic

responsibilities, or other direct professional responsibilities, in relation to a student or students (other than in the specific circumstances relating to an “excluded relationship”, as defined below).

Relevant staff members include:

- a) Teaching staff, such as lecturers or graduate teaching assistants.
- b) Dissertation or project supervisors for taught postgraduate students or research students.
- c) Academic Advisors and pastoral support.
- d) Senior members of staff with responsibility or oversight of wider institutional strategy, processes and delivery, for example, vice-principals.
- e) PS staff involved in the direct provision of services to students.
- f) Security staff.

Members of staff with wider institutional responsibilities and security staff are taken to have direct professional responsibilities in relation to any student. Members of staff with wider institutional responsibilities are defined as:

- g) The Principal and President and Members of the Senior Executive Team.
- h) Members of the Professional Services Leadership Team.
- i) Members of Faculty Executive Teams.

5.5. An “**excluded relationship**” means any ongoing intimate personal relationship that:

- a) existed before the date this policy came into force and that remained in existence; or
- b) existed before the date that the staff member became a relevant staff member; or
- c) existed before the date that the student became a student (and does not otherwise qualify for prohibition).

6. Roles and responsibilities

Staff duties and responsibilities

6.1. This policy applies to all staff.

- 6.2. Where staff have reason to believe that there may have been a breach of this policy they must report this (see below).
- 6.3. Staff have a responsibility not to enter into any prohibited relationships, as set outlined in this policy.
- 6.4. Staff have the responsibility to report/disclose any relevant relationships in a timely manner (see below)

Student duties and responsibilities

- 6.5. Where a student considers that there may have been any misconduct by staff under this policy, whether this is directed towards them or another student, they are strongly encouraged to report it, as outlined in the “Reporting Misconduct” guidance (set out below).
- 6.6. Students are strongly encouraged to report and seek support for harassment or sexual misconduct that occurs within a relationship with a staff member, regardless of whether the relationship is a prohibited intimate personal relationship or otherwise. Students will not be penalised by the University on the grounds of participating in any such relationship with a member of staff and they will be protected from victimisation if they report harassment or sexual misconduct by a member of staff.
- 6.7. Nothing in this policy places any specific duties or responsibilities on students.

University Duties and Responsibilities

- 6.8. The University will ensure no student suffers any detriment for making a disclosure under this policy.
- 6.9. The University will provide a single, comprehensive source of information on our approach to the prevention, and addressing of, sexual harassment and misconduct (see Report + Support for more information).

7. Prohibited intimate personal relationships

- 7.1. A “relevant staff member” is **strictly prohibited** from entering into an intimate personal relationship with a student.
- 7.2. Other than in relation to an “excluded relationship” (defined in S6, above), any breach of this prohibition by a relevant staff member will result in the University taking appropriate steps under the Discipline Policy and Procedure, including the possibility of the breach resulting in dismissal of the relevant staff member for gross misconduct. These steps will include an investigation to establish all of the relevant facts and context, as set out below.
- 7.3. The prohibition outlined in this section is absolute and does not cease to apply on

grounds of a relationship being consensual.

8. Investigations regarding prohibited intimate personal relationships

- 8.1. The University will take appropriate steps under the Discipline Policy and Procedure, where it appears that a relevant staff member may have breached the prohibition on their entering into an intimate personal relationship with a student. This includes the possibility of serious (gross) misconduct resulting in the dismissal of the member of staff. The University will undertake an investigation to establish all of the facts and context. The consequences of any breach will be proportionate to the seriousness of the conduct that has taken place.
- 8.2. It is recognised that investigations relating to alleged breaches of the staff-student relationships policy are likely to be difficult and complex. Further guidance and support from HR in conducting such investigations must be sought through the HR Partners or Employee Relations team and The Appeals, Complaints and Conduct Office.
- 8.3. Where staff are engaged by the University under arrangements other than a contract of employment, an equivalent, appropriate process will be followed to consider whether the engagement should be terminated.

9. Investigations regarding harassment or sexual misconduct

- 9.1. Allegations of harassment or sexual misconduct by any member of staff will be investigated under the University's Discipline Policy and Procedure. This includes the possibility of serious (gross) misconduct resulting in the dismissal of the member of staff. In all such cases, the University will undertake an investigation to establish the facts and context.
- 9.2. It is recognised that investigations relating to harassment or sexual misconduct are likely to be difficult and complex. Further guidance and support from HR in conducting such investigations must be sought through the HR Partners or Employee Relations team and The Appeals, Complaints and Conduct Office.
- 9.3. Where staff are engaged by the University under arrangements other than a contract of employment, an equivalent, appropriate process will be followed to consider whether the engagement should be terminated.

10. Procedure for staff to declare a personal / family relationship with a student

Which personal/familial relationships should be declared

- 10.1. This procedure relates to a member of staff declaring a personal relationship with a student which is not prohibited (i.e. it does not apply to intimate personal relationships between a relevant staff and a student, as described above). In other circumstances, any personal/familial relationship between any member of staff and a student must be declared by the member of staff to the Head of School/Institute (for Academic staff) or Faculty Director of Operations/Director (for Professional Services staff), who will initiate appropriate measures, as required, to ensure that equity of treatment of the student is maintained. Heads/Directors and more senior staff should declare personal relationships to their line manager.
- 10.2. The Head of School/Institute (for Academic staff) or Faculty Director of Operations/Director (for Professional Services staff) will write to the member of staff setting out the appropriate measures (if required) that are to be put in place to ensure equity of treatment of the student.
- 10.3. Where there is an intimate personal relationship, that is an excluded relationship (as set out above), the member of staff must promptly declare the relationship to the Head of School/Institute (for Academic staff) or Faculty Director of Operations/Director (for Professional Services staff), who will initiate appropriate measures to ensure that equity of treatment of the student is maintained.
- 10.4. Prompt declaration means a declaration at the earliest reasonable opportunity and, in any event, a declaration within four weeks of the date that the staff member became a relevant staff member (or the date this policy came into force, as set out above, if later). Failure to make a prompt declaration is likely to result in the University regarding the intimate personal relationship as being prohibited, rather than excluded, and treated accordingly (as set out above).

How to declare a personal/familial relationship

- 10.5. Members of staff must declare, in confidence, to their Head of School (for Academic staff) or Faculty Director of Operations/Director (for Professional Services staff) any personal/familial relationship they have with a student or students. A confidential written/email record of the declaration should be provided.

Appropriate measures to be taken by line management

- 10.6. When a Head of School/Institute (for Academic staff) or Faculty Director of Operations/Director (for Professional Services staff) be made aware of a personal relationship likely to be covered by this policy, they must initiate appropriate measures (see accompanying guidance); taking account of any responsibilities the individual has outside of their home School/Institute or Department.

- 10.7. What constitutes appropriate measures will vary depending on the circumstances: the objective is to put in place reasonable arrangements to ensure that any risks (real or perceived) potentially affecting the equity of treatment of the student in the personal relationship are mitigated. In many cases, such as where there is a family relationship with a student in a different School to that in which the member of staff works/operates, there will be no need for any measures to be implemented. Conversely, where a member of staff would otherwise have direct responsibilities for a student with whom they have a personal/familial relationship, appropriate measures are likely to include the revision of the duties of the member of staff, such that these direct responsibilities no longer apply.
- 10.8. It is recognised that there will be circumstances in which the appropriate measures that are required may be complex and further guidance and support will be available from HR through the HR Partners or Employee Relations team.
- 10.9. The appropriate measures to be put in place should be confirmed with the member of staff, in confidence, in writing/email. Confidential records of the personal relationships and the appropriate measures put in place must be maintained by the Head of School (for Academic staff) or Faculty Director of Operations/Director (for Professional Services staff) and must be destroyed when the arrangements are no longer required (such as when the student leaves the University, or upon notification the relationship is no longer relevant). For continuity purposes, arrangements should be made for another nominated senior colleague to have access to the records of personal relationships and appropriate measures.

Failure to declare a personal/familial relationship

- 10.10. Any staff breach of the requirement to declare a personal/familial relationship under this policy will be investigated and may result in the University taking appropriate steps in line with the Discipline Policy and Procedure. In relation to staff who are engaged by the University under arrangements other than a contract of employment, an equivalent, appropriate process will be followed.

11. Students under the age of 18

- 11.1. Where students are under the age of 18 (e.g. summer school, or students u18), only relationships of a professional or familial nature are permitted. **All staff are strictly prohibited** from involvement in any other personal relationships, or intimate personal relationships, with these students, who are considered minors, as this is a safeguarding risk.
- 11.2. Any breach of this prohibition will result in the University taking appropriate steps in line with its usual disciplinary process, including the possibility of the breach

resulting in dismissal of the relevant staff member for gross misconduct. In relation to staff who are engaged by the University under arrangements other than a contract of employment, an equivalent, appropriate process will be followed to consider whether the engagement should be terminated.

- 11.3. **All staff** should also be aware that it is a **criminal offence** (under the Sexual Offences Act 2003) for any member of staff or person in a position of trust to engage in sexual activity with a student under the age of 18, regardless of whether they have reached the age of consent. The University has a duty to notify police and other external agencies in relation to such criminality.

12. Students in need of safeguarding

- 12.1. Measures are also required to protect certain adult students in need of safeguarding.
- 12.2. Students over the age of 18 are considered to be in need of safeguarding where they:
- have care and support needs;
 - are experiencing, or are at risk of, abuse or neglect;
- 12.3. as a result of their care and support needs are unable to protect themselves against the abuse or neglect or the risk of it.
- 12.4. Only relationships of a professional or familial nature are permitted with students in need of safeguarding. **All staff** are **strictly prohibited** from involvement in any other personal relationships, or intimate personal relationships, with these students, as this would be considered a safeguarding risk.
- 12.5. Any breach of this prohibition will result in the University taking appropriate steps in line with its usual disciplinary process, including the possibility of the breach resulting in the dismissal of the relevant staff member for gross misconduct. In relation to staff who are engaged by the University under arrangements other than a contract of employment, an equivalent, appropriate process will be followed to consider whether the engagement should be terminated.

13. Reporting misconduct

- 13.1. Where a student, or a person interacting with the University in any other way, considers that a member of staff may have breached this policy or been involved in harassment or sexual misconduct, they are strongly encouraged to report it.

- 13.2. Where a staff member considers that a member of staff may have breached this policy or been involved in this policy they are must report it.
- 13.3. Report + Support, our secure online platform for reporting incidents and seeking support and information is available here:

[Report + Support - Report + Support - Queen Mary University of London](#)

Report + Support is the **University's single, comprehensive source of information** regarding bullying, (sexual) harassment and misconduct. It contains further information, guidance and support resources for students and staff impacted by these issues.

14. Review

- 14.1. This policy will be reviewed at least every three years.
- 14.2. Minor updates to this policy that do not affect the rules, principles or intent of this policy may be approved by HR Director and a relevant Senior Executive Nominee (typically the Chair of Equality, Diversity & Inclusion Steering Group) on behalf of the Senior Executive Team.

Policy Information and Document Control

Policy title	Staff-Student Relationship Policy
Version number	2.0
Related policies and procedures	Conflict of Interest Policy Staff Discipline Policy and Procedure Safeguarding Children and Adults at Risk Policy and Procedure
Superseded policies	Deletes and replaces previous Staff-Student Relationship Policy
Approval level	Senior Executive Team
Approval date	8 July 2025
Effective date	31 st July 2025
Next review due	July 2028
Policy owner	HR Director
Policy contact	Employee Relations Policy & Projects Manager

Version Control

Version	Date	Reason for updates/Summary of key changes
2	8 July 2025	E6 OfS requirements for implementation by 1 August 2025