

Staff and Student Relationships

Policy

1. Introduction and Purpose

Royal Holloway University of London is dedicated to fostering an environment built on trust, respect, and academic integrity. This commitment aligns with our legal obligations, safeguarding legislation, and regulatory standards, including those of the Office for Students.

By setting out clear guidance, this policy seeks to protect all individuals, prevent misunderstandings, and uphold the values of respect, openness, equality, and inclusion across Royal Holloway.

The purpose of this Policy is to:

- Ensure the welfare of all University members establishing clear boundaries in colleaguestudent interactions.
- Prevent conflicts of interest and potential abuses of power
- Protect and maintain the integrity of academic and professional relationships
- Protect the well-being, safety and academic interests of our students
- Provide clear guidance on appropriate conduct in colleague-student relationships
- Foster an inclusive and equitable environment free from bias or undue influence

2. Scope and Applicability

This policy applies to close and intimate relationships between colleagues and students. Relationships between colleagues are covered under the Personal Relationships at Work – Colleagues Policy.

3. Definitions

Colleagues refer to those who are directly employed for work by the University, those who are engaged to work and those with a visiting role. This is regardless of contract type.

Relevant Colleagues are colleagues who have direct or indirect academic responsibilities, or other direct or indirect professional responsibilities, in relation to a student. This includes, but is not limited to, lecturers, tutors, supervisors, advisors, and professional services colleagues with decision-making authority over student matters.

Other Colleagues refers to all other colleagues not defined as a Relevant Colleague.

Students covers undergraduate and postgraduate students (full-time, part-time, exchange, visiting), applicants, and offer holders.

Intimate Relationship is a relationship that involves one of more of the following:

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

Close Personal Relationships which may be perceived as having the potential to influence academic or professional decisions or that may create an undue sense of obligation are considered to be intimate relationships for the purpose of this policy.

Abuse of power is where a colleague uses their position of power or authority in an unacceptable manner. Abuse of power can take various forms and may include, but is not limited to, grooming, manipulation, coercion, putting pressure on others to engage in conduct they do not feel comfortable with, or that results in something that falls within the scope of an intimate personal relationship.

Examples of relationships and roles can be found in Appendices B – D to this policy.

4. Roles and Responsibilities

All Colleagues:

- Understand and adhere to this policy
- Maintain professional boundaries with students
- Raise concerns with a relevant and responsible person

Relevant Colleagues:

- Must not have an intimate or close personal relationships with students who they have direct or indirect responsibility
- Accept and adhere to any actions put in place to remove the indirect or direct responsibilities where a pre-existing relationship exists

Other Colleagues:

- Avoid developing intimate or close personal relationships with students
- Disclose any relationships with students
 Cooperate with any measures advised following a risk assessment

Exec Deans/Heads of Departments/Director.

- Ensure all staff are aware of and comply with this policy
- Handle disclosures confidentially and sensitively

Human Resources (HR):

- Provide guidance on the application of this policy
- Support managers in addressing policy violations
- Maintain confidential records of disclosures and actions taken

Students:

- Be aware of this policy and its implications
- Report any concerns about staff conduct that may violate this policy

5. Key Principles

Colleagues must assess the nature of their work responsibilities for students to determine whether they are a Relevant Colleague or Other Colleague under this policy. Refer to Appendix B for illustrative examples of direct and indirect responsibilities.

The designation of being a Relevant Colleague or an Other Colleague is not static and may change if the work responsibilities a colleague has for a student changes. (see 5.3, 5.4)

Positive professional relationships are part of a safe, inclusive learning environment. The University encourages positive professional relationships between colleagues and students. However, it is the colleague's responsibility to ensure that professional boundaries are maintained at all times to safeguard a student's wellbeing and uphold academic integrity.

- All colleagues must conduct themselves professionally and appropriately in their dealings with colleagues and students.
- Colleagues in positions of influence should ensure their behaviour does not put students in an uncomfortable or difficult position.
- Colleagues should be aware of real and perceived power imbalances and ensure that contact and behaviour remains professional, appropriate, and non-intimidating.
- Coercive or exploitative relationships are never acceptable.
- Relationships with students under the age of 18 are never acceptable.

6. The University Position on Relationships between Colleagues and Students.

6.1 Relevant Colleagues

Relevant Colleagues, ie those with direct or indirect responsibility for the student **are prohibited** from having an intimate relationship with a student. This applies whether they are academic or professional services.

If in doubt, a colleague should discuss this with their Head of Department/Director, or their Human Resources Business Partner.

6.2 Other Colleagues

Other Colleagues **are strongly discouraged** from entering into intimate personal relationships with students.

If such a relationship develops it **must be disclosed**.

7. Changes in Responsibilities and Relationships

7.1 Changes in Colleague Status

There may be times when a change in circumstances relevant to this policy arises where a colleague who has a pre-existing relationship assumes direct or indirect work responsibilities for the student. i.e., re-allocation of responsibilities of teaching or taking up a new role.

- In these circumstances the colleague must report the pre-existing relationship immediately and in advance of assuming the new responsibilities to the Head of Department and Executive Dean (if based in an academic area) or Director and Executive Director (if based in a Professional Services), and the Human Resources Business Partner.
- Alternative arrangements will be put in place to remove any direct or indirect responsibilities for the student. These may include:
 - a. Reassigning the colleague's duties related to the student.
 - b. Excluding the colleague from the student's assessment or supervision.
 - c. Relocating the colleague to a different team.
- This list is not exhaustive, it can include any actions that remove the direct or indirect responsibility.

7.2 Change in Student Status or Awareness of Student Status

If a colleague becomes aware that the other party in an existing relationship is a student, or the other party in an existing relationship becomes a student then the colleague must report the relationship to the Head of Department/Director as soon as they become aware.

If there is a direct or indirect responsibility 6.1 should be followed. If there is no direct or indirect responsibility then 6.2 should be followed.

7.3 When a relationship ends

If a relationship with a student ends, it is the colleague's responsibility to update the Human Resources Business Partner to ensure records are accurate.

7.4 Relationships Pre-dating the introduction of this policy

Relevant and Other relationships that pre-date the introduction of this policy must be disclosed in accordance with Appendix E of this policy.

8. Family Members and Friends

Family and friendship relationships may constitute close personal relationships for the purposes of this policy which could still give rise to a potential form of dependence including emotional, practical or financial and/or could lead to favouritism towards the student.

The same principles apply with regards to relevant and other staff members.

9. Disclosing a Relationship

For all relationships that require disclosure the Staff/Student Relationships Declaration Form must be submitted to the Human Resources Business Partner who will arrange for the following:

- A risk assessment to be undertaken by the Head of Department and Executive Dean, or by the Director and Executive Director to identify any conflict of interest or potential abuse of power.
- If a potential for conflict of interest or potential abuse of power is identified then the Other Colleague will be considered to be a Relevant Colleague for the purposes of this policy.
- If no potential conflict for interest or potential abuse of power is identified, then the Other Colleague and Student will be reminded of the rights and obligations under this policy.

Disclosures will be treated confidentially and only shared on a need-to-know basis.

10. Reporting Concerns

Students with concerns about a colleague's behaviour or those who may feel pressured into a relationship should identify their concerns to:

- Their Head of Department,
- Student Life particularly via the Wellbeing Support team,
- The University's confidential reporting system, RH Be Heard.

Colleagues who have concerns about another colleague's behaviour should report it to their Head of Department or Director of Service and the Human Resources Business Partner.

Individuals who report issues in good faith, whether a colleague or student, will not face any form of consequence for their actions.

Concerns raised under this policy will be treated in confidence as far as is reasonably possible and is consistent with safeguarding the welfare of our students.

11. Malicious or Vexatious Complaints

If it is found a colleague or student has made a malicious or vexatious complaint or report the University may instigate its disciplinary process against them to address the matter. Such action will not be taken in instances where the complaint or report is mistaken or ill-founded. Support will be offered to students whose complaints have not been taken forward under these circumstances.

- A malicious complaint is one that is made with the intention to intimidate, to lower the
 reputation of, or otherwise injure or harm a person, through knowingly providing false or
 misleading information or withholding information about an incident or issue.
- A vexatious complaint is either one that is made with the sole or main intention to harass, annoy or subdue somebody, or one that is unreasonable, without foundation, frivolous, repetitive, deliberately burdensome or unwarranted.

12. Policy Violation

A breach of this policy including failure to disclose an intimate personal relationship (including close personal relationships) will be managed through the Disciplinary Policy.

Heads of Departments and Directors who become aware of a relationship should immediately meet with the colleague to establish the facts and, in conjunction with the Human Resources Business Partner, devise a plan of action.

Disciplinary investigations will consider:

- Whether the colleague knew or should reasonably have known that the other party was a student. Non-disclosure may be excused if the colleague had no way of knowing this information.
- Whether true consent was possible given any power imbalance. Even if both parties believe
 consent was freely given, the University will evaluate whether the institutional power dynamics
 impacted the relationship.
- Whether the relationship would have formed if not for the colleague's position within the University. The University will assess if the position of authority or influence was a significant factor in the relationship's development.

Serious violations of this policy will be considered to be gross misconduct.

A colleague may be suspended following consideration if there is a potential risk to the welfare of the student and/or other students arising from the nature of the allegations against the colleague.

13. Confidentiality

The completed Declaration Form will be saved on the colleague's file.

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

Communication should take account of the needs of the student, the colleague and any data protection/privacy rights. In most cases communication should only be done with the student's consent, unless there is a serious and compelling welfare concern or risk affecting the student and/or other students.

14. Support

14.1 Advice for Colleagues

The University will provide training and guidance to colleagues on maintaining professional boundaries and recognising potential conflicts of interest.

Support services will be available to colleagues who may be affected by issues related to this policy.

Contact details can be found in Appendix A.

14.2 Advice for Students.

The University provides training for students on matters of consent and appropriate boundaries and will support students where questions may be raised on these topics.

Students can access support through University support services including Harassment & Wellbeing Advisers, Counsellors and Chaplains. Through any of the support services students can also be referred or signposted to specialist external services as appropriate.

Royal Holloway will take appropriate steps to protect students from any negative consequences resulting from a colleague's violation of this policy.

15. Monitoring and Compliance

HR will monitor the effectiveness of the policy that the policy is achieving its intended purpose. Policy issues arising from the monitoring process, including its application by managers, and any equality and diversity concerns will be investigated by the Human Resources Department and University management as appropriate. Any such issues will be annually reviewed by the relevant University committee to consider appropriate action.

16. Links to other policies

The policies and information set out below may be of assistance to those accessing this policy:

- Personal Relationships at Work Colleagues
- Disciplinary Policy and Procedures
- Dignity at Work Policy

17. Policy Review

This policy will be reviewed every 2 years by the Human Resources department in consultation with relevant stakeholders to ensure ongoing compliance with OfS requirements and best practices.

Policy Schedule	
Policy Owner	Director of Human Resources
Policy Lead Contact	Deputy Head of HR Operations
Consultation with University Unions	UCU, Unite, GMB
Final Approval Body	Executive Board
Date of Approval	June 2025
Review Interval	Every 2 years
To Be Reviewed Before	June 2027
Version 1	

Appendix A

Support and Sources for Further Information and Advice

The University provides a free and confidential Employee Wellbeing Programme (EWP), which is available for colleagues on substantive contracts of employment to access. Run by Confidential Care (CiC), the service is available 24 hours a day, 7 days a week, 365 days a year via telephone, email or online.

The Employee Wellbeing Programme offers independent, confidential information, support and advice to all colleagues and their immediate family (living in the same household) on matters including debt and financial management, legal and tax guidance, family care (dependants, childcare, elder care support) as well as day-to-day matters. CiC also provides counselling and emotional support to colleagues.

CiC can be contacted via:

- Telephone: 0800 085 1376 or +44 (0)207 938 0963
- Email: <u>assist@cic-eap.co.uk</u>
- Skype: using 'Confidential Care Adviceline.'
- Text Relay (for people with hearing or speech impairments): 1800 0800 085 1376
- (Online and Live Chat): www.well-online.co.uk

Appendix B

Examples of Direct and Indirect Responsibilities

The list below provides examples that illustrate direct and indirect responsibilities. The examples below illustrate the range of situations where power imbalances could exist, making relationships inappropriate due to the potential for undue influence or conflicts of interest. This list is not exhaustive.

Direct Academic Responsibilities

- Teaching courses on which the student is enrolled
- Supervising a student's thesis, dissertation, or research project
- Serving as a student's academic advisor or personal tutor
- Evaluating a student's coursework, exams, or other academic submissions
- Participating in the student's assessment panels or examination committees
- Providing references or recommendations for the student
- Making decisions about course extensions, special considerations, or accommodations
- Supervising laboratory or fieldwork involving the student
- Leading study abroad programs or field trips in which the student participates
- Mentoring the student in an official capacity

Indirect Academic Responsibilities:

- Teaching in the same department but not directly teaching the student's courses
- Serving on departmental committees that make decisions affecting the student's program
- Contributing to curriculum development that impacts the student's course of study
- Participating in departmental funding allocation decisions that may affect the student
- Being involved in appeals processes the student might access
- Collaborating with the student's direct supervisor on research
- Serving as second marker for another School/departmental member who directly teaches the student
- Being part of teaching teams where colleagues share assessment responsibilities
- Having authority to approve equipment or resource access for student projects
- Involvement in departmental student selection or scholarship committees

Direct Research Responsibilities:

- Supervising the student on a research project
- Managing a laboratory or research group where the student is engaged
- Controlling access to research facilities or equipment the student needs
- Determining the student's research funding or stipend
- Contributing to decisions about the student's authorship on publications
- Evaluating the student's research progress or performance
- Training the student in specialised research techniques
- Making decisions about the student's attendance at conferences
- Supervising the student in a research assistant role
- Leading research projects on which the student depends for thesis completion

Indirect Research Responsibilities:

- Managing resources in an area where the student conducts work
- Serving on research ethics committees reviewing the student's proposals
- Advising on methodology for research in which the student is involved
- Being part of research networks or consortia that fund the student's work
- Contributing to departmental/School research strategies affecting available opportunities
- Participating in research assessment exercises affecting the student's department or School
- Having input on research prioritisation that impacts the student's area of study

- Managing relationships with industry partners collaborating with the student
- Being responsible for research compliance in areas affecting the student
- Administering grant funding that supports the student's research project

Direct Professional Services/Support Services Responsibilities:

- Processing the student's financial aid, scholarships, or bursaries
- Managing housing assignments or residential life
- Providing counselling or mental health services to the student
- Deciding on the student's disciplinary cases or academic misconduct allegations
- Advising the student on career opportunities or internships
- Providing technical support for systems critical to the student's academic progress
- Managing the student's records or registration status

Indirect Professional Services Responsibilities:

- Managing departments that handle the student's administrative needs
- Overseeing budgets for services the student uses
- Establishing protocol around access to the student's confidential records or information
- Being involved in appeals procedures the student might access
- Managing staff who directly provide services to the student

Appendix C

Actions Following Disclosure of a Relevant Relationship

The University strongly discourages relationships between colleagues and students, and where there is a direct or indirect work responsibility relationships are prohibited. The University also recognises a colleague's right to a private life. If a relationship is declared action will be taken to remove all direct or indirect responsibilities over the student for as long as the intimate or close personal relationship is in place. Actions may include:

Any changes implemented need to be properly documented, monitored, and periodically reviewed to ensure they effectively remove the potential for conflicts of interest or power imbalances between the colleague and the student.

Teaching and Educational Delivery

- Reassignment of teaching duties:
 - Transfer the student to a different section of the same course taught by another colleague
 - o Arrange for a different professor to grade the student's assignments and exams
- Research supervision adjustments:
 - o Appoint an alternative primary supervisor for the student's thesis or dissertation
 - Establish a co-supervision arrangement where another colleague takes primary responsibility
- Academic advising changes:
 - o Reassign the student to a different academic advisor or personal tutor
 - o Implement a temporary advising arrangement with another School member
- Committee participation modifications:
 - o Recuse the colleague from any examination committees involving the student
 - o Arrange for another committee member to evaluate the student's work
- Reference and recommendation arrangements:
 - Establish that references or recommendations must come from other departmental/School members
 - Create a system where recommendations are provided by a suitable alternative
- Assessment adjustments:
 - o Implement blind marking for the student's work
 - Arrange for a different colleague to be responsible for all assessment of the student's
 - Set up an independent verification process for all grades
- Departmental decision-making:
 - o Exclude the colleague from departmental decisions specifically affecting the student
 - o Create transparent documentation of decision rationales when the student is involved

Research Responsibilities

- Laboratory or research group changes:
 - Transfer the student to a different research group or lab
 - Establish an alternative supervisory structure within the same lab
- Research resource allocation:
 - o Create an independent process for approving the student's access to facilities
 - Delegate equipment authorisation to another senior researcher or Head of Department
- Research funding decisions:
 - o Remove the colleague from decisions about the student's funding
 - Establish an independent committee to handle the student's research support
- Publication and authorship arrangements:
 - o Create clear, pre-documented authorship agreements for all projects
 - o Assign another senior researcher to make authorship determinations

- Conference and development opportunities:
 - Implement a department-wide process for conference attendance approvals
 - Delegate professional development decisions to the Head of Department

Professional Services

- Financial processing:
 - Assign the student's financial matters to a different staff member
 - Implement additional oversight for any financial decisions involving the student
- · Housing and residential life:
 - o Transfer responsibility for the student's housing to another colleague
- Support service provision:
 - Arrange for the student to receive counselling or support from a different individual
 - o Establish clear boundaries regarding access to the student's support records
- Administrative processing:
 - Reassign the processing of the student's administrative matters
 - o Implement additional verification steps for administrative decisions
- Career services and opportunities:
 - Have another advisor handle the student's career counselling and internship or job placement opportunities
- Disciplinary and misconduct cases:
 - o Ensure complete recusal from any disciplinary proceedings
 - Establish independent review processes if the student is involved
- Management structure changes:
 - o Reorganise reporting lines to remove oversight of services the student uses
 - o Implement temporary management changes in relation to the student

General Changes

- Committee reassignments:
 - o Adjust committee memberships to avoid potential conflicts
 - o Create clear recusal protocols for committee decisions
- Information access restrictions:
 - Provide clear protocols around expectations on colleague accessing student's records or information and clarity on sanctions if not upheld
 - Implement technical barriers to accessing the student's data where possible

Appendix D

Potential risks for other colleagues

Risks and Mitigations for 'Other Colleagues'

When colleagues with no direct or indirect responsibilities for a student, have a relationship with a student this can present a risk to both parties and the University. The non-exhaustive list below provides examples of these that should be discussed with the colleague and the potential mitigations that may be put in place.

Potential Risks

Institutional Risks:

- Perception issues Even without direct responsibility, relationships may be perceived as inappropriate by other students or colleagues
- Future conflicts of interest Responsibilities can change over time, potentially creating future conflicts (these would need to be managed under the process for 'relevant' colleagues if applicable)
- Institutional reputation damage Public perception may not distinguish between different types of relationships
- Cultural impact May contribute to a culture where boundaries between colleagues and students become blurred
- Legal vulnerability Could create liability if the relationship is later claimed to have been coercive

Risks to Students:

- Informal power dynamics Colleagues have institutional knowledge and connections that create implicit power imbalances
- Academic community impacts May affect student's relationships with peers or other colleagues
- Career development concerns Could influence future opportunities within the University
- Psychological pressure Students may feel unable to end relationships
- Access to confidential information Colleagues may have indirect access to student information through colleagues

Risks to Staff:

- Professional reputation impact There may be impact on how others perceive the colleague
- Workplace discomfort May create awkward dynamics with other colleagues who teach or supervise the student
- Vulnerability to allegations Higher risk of misconduct allegations even without direct power
- Ethical challenges Navigating dual relationships within the same community

Appendix E

Disclosure of pre-existing colleague student relationships on the date of introduction of the Colleague-Student Intimate Relationships Policy

1. Introduction

The new policy **prohibits** intimate or close personal relationships between any colleague with direct or indirect academic or professional responsibility for a student ("Relevant Colleagues")

All colleagues are strongly **discouraged** from entering into relationships with any students i.e. even if they are not 'Relevant Colleagues'. Any relationship with a student must be disclosed.

This appendix should be read in conjunction with the attached policy.

2. Existing Intimate or Close Personal Relationships

If you have an intimate or close relationship with a student at the date of introduction of this policy you must take the following actions:

• If you have direct or indirect responsibility for the student:

- You must immediately disclose the relationship to your Head of Department/Director of Service and your HR Business Partner.
- o Your responsibilities in relation to the student will be re-allocated
- You will be reminded of your obligations under the policy

• If you have no direct or indirect responsibility for the student:

- o You must disclose the relationship using the Staff-Student Relations Declaration Form
- o A risk assessment will be conducted to confirm you have no relevant responsibilities
- You will be reminded of your obligations under the policy

If your relationship with a student ends this must be disclosed to your HR Business Partner so they can keep a record of this on the file.