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GBS Consensual Relationships Policy

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Related GBS policies

- GBS Sexual Misconduct and Sexual Assault Policy
- GBS Equality and Diversity Policy
- GBS Student Code of Conduct
- GBS Anti-harassment and anti-bullying Policy and Procedure: Staff
- GBS Anti-harassment and anti-bullying Policy and Procedure: Student
- GBS Safeguarding Policy
- GBS Prevent Policy

External Reference Points

- OfS Student guide to harassment and sexual misconduct <https://www.officeforstudents.org.uk/for-students/student-rights-and-welfare/student-guide-to-harassment-and-sexual-misconduct/>
- Equality Act 2010 <https://www.legislation.gov.uk/ukpga/2010/15/contents>
- Sexual Offences Act 2003 <https://www.legislation.gov.uk/ukpga/2003/42/contents>
- Protection from Harassment Act 1997 <https://www.legislation.gov.uk/ukpga/1997/40/contents>

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1. Policy Statement

1.1. Global Banking School (GBS) values and relies upon the professional integrity of relationships between staff members and in the staff/student relationship. In order that GBS' business is conducted and is perceived to be conducted professionally and properly, it is necessary to distinguish between, and take account of, consensual/personal relationships which overlap with professional ones. It recognises that there may be occasions when staff members or students (or prospective students) are related or become close or romantically involved with 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 establish acceptable treatment and guide behaviour in such situations.

1.2. In the context of this document, a consensual/personal relationship is defined as:

- A family relationship
- A business/commercial/financial relationship or
- A sexual/romantic relationship (current or former)

This list is not exhaustive

1.3. The Policy applies to all staff, but particular provisions are set out for those members of staff who have direct or indirect academic responsibilities, or other direct professional responsibilities, in relation to a student (referred to as Relevant staff members).

1.4. This Policy is accompanied by a flowchart for staff and students on managing disclosure.

1.5. This Policy is not contractual and may be amended from time to time, in light of changes in legislation or operational requirements.

2. Purpose

2.1 This Policy seeks to protect members of staff and students from misconduct and allegations of actual or perceived conflicts of interest by providing a framework of guidance and regulations and by ensuring appropriate safeguards and processes are in place to prevent abuses of power and sexual misconduct.

2.2 In particular, the Policy aims to prevent intentional or unintentional conflicts of interest or abuses of power that may occur within seemingly consensual relationships between staff members and students and staff members. Students could potentially experience the negative effects of an inherent power imbalance, even where a staff member does not seek to abuse their power. For example, a student may feel pressured to commence an intimate relationship

with a Relevant staff member, take such a relationship further than they might otherwise wish or not feel able to end such a relationship, on the basis that to do so may result in detriment.

3. Scope of this Policy

3.1 This Policy applies to:

- i. All GBS staff: all individuals employed or engaged by the Company, whether paid or unpaid, to carry out work for the Company. This includes (but is not limited to): employees, managers, executives and board members, agency workers, temporary staff, contractors, and volunteers; students undertaking paid or unpaid work for GBS; and
- ii. All students of GBS: includes any person currently studying for an undergraduate or postgraduate qualification.
- iii. This Policy applies to personal relationships between staff members or between members of staff and students. It is the expectation of GBS that all partner institutions will have an aligned Policy as regards such relationships.

4. Definitions

4.1 **Abuse of power** is where a position of power or authority is used in an unacceptable manner.

This can take various forms and may include, but is not limited to, grooming, manipulation, coercion and pressurising others to engage in conduct they do not feel comfortable with.

4.2 **Close personal relationship** excludes intimate relationships, but means a relationship where the nature, content, involvement and/or frequency of interactions and/or communications between a staff member and a student transgress the boundaries of professional conduct or may be reasonably perceived to do so.

4.3 **Grooming** is when a person builds a relationship with a child, young person or an adult who is at risk so they can abuse them and manipulate them into doing things. The abuse is usually sexual or financial, but it can also include other illegal acts.

4.4 **Intimate relationship** is a consensual relationship characterised by emotional, physical, and/or sexual intimacy, which may be conducted in person and/or online and/or via electronic or any other form of communication. This includes brief relationships and one-off occurrences, through to marriage or life partnerships, regardless of gender, gender identity or sexual orientation.

4.5 **Member of staff** includes any person working within the Company under a formal contract of employment or as a casual worker or any individual working within the Company under a contract for services and/or in a self-employed capacity. If a student works for the Company

in a teaching, pastoral or supervisory capacity, this Policy applies to them in that capacity as members of staff.

4.6 **Relevant staff** member means a member of staff who has direct or indirect academic responsibilities, or other direct professional responsibilities, in relation to that student.

4.7 **Responsibility for a student** is defined widely and includes any teaching, professional, pastoral or administrative responsibility or authority over a student, whether temporary or permanent, whether formally conferred on or voluntarily assumed by the staff member. This includes but is not limited to lecturing, teaching classes or seminars, overseeing projects, supervising, and setting and/or marking of examinations or other assessments of any type.

5. Roles and Responsibilities

5.1 All members of staff must act in compliance with this Policy.

5.2 All roles involved in providing direct guidance and support to members of staff and students are responsible for ensuring that information is handled confidentially.

5.3 The HR Department is responsible for ensuring that this Policy is maintained and that appropriate supplementary guidance is provided to support its use.

5.4 Deans are responsible for making sure that staff members within their faculties are aware of this Policy; ensuring that up-to-date records of declarations and conflicts of interest are maintained and determining how to manage each situation while recording it appropriately.

5.5 The Dean of Students, with support from the HR Department, will periodically review disclosures within the Company relating to the Policy and any resulting protective actions and measures taken.

6. Principles

6.1 At different times, or concurrently, individuals could fall within or move between different relationship categorisations, such as a student who also works for GBS as a member of staff. In such cases, the person should act in accordance with the requirements that apply to both staff and students.

6.2 This Policy covers all situations where a relationship might raise questions about conflict of interest, trust and/or confidentiality. Such conflicts could arise in relation to the following areas:

- all aspects of teaching, learning and research;

- all aspects of student welfare, including the pastoral support of students;
- access to student services including financial assistance and other services;
- management and supervision of staff, including career progression and staff development;
- allocation of financial and other resource by budget holders;
- access to confidential information;
- employment matters including career opportunities, placements, complaints and discipline;
- provision of references or reviews; and
- assignment of work and facilities to staff or students.

This list is not exhaustive.

7. Relationships between staff and students

7.1 The integrity of the academic relationship between staff and their students is of fundamental importance. All members of staff have 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.

7.2 With effect from the Policy commencement date:

- Relevant staff members are prohibited from pursuing or entering into an intimate relationship (as defined in clause 4.4 of this policy) with any student. Failure to comply with this Policy will be considered as a disciplinary matter.
- Relevant staff members are strongly discouraged from having any close personal relationship (as defined in clause 4.2 of this policy) with any student and must declare if such a relationship has developed, is developing or appears likely to develop between them and any student. All disclosures will be assessed on a case-by-case basis. A failure to declare will be considered as a disciplinary matter.

7.3 With effect from the Policy commencement date Relevant staff members must not take on or assume a professional responsibility for a student:

- with whom they are in an existing intimate relationship or with whom they previously had such a relationship; or
- with whom they are in any close personal relationship or with whom they previously had such a relationship without first declaring this to their Line Manager, to enable them to assess the risk of conflicts of interest and put appropriate measures in place as necessary.

7.4 If at the Policy commencement date, a Relevant staff member:

- i. is already in an intimate or any close personal relationship with any student;
- ii. or has previously been in an intimate or any close personal relationship with any student:

they should declare that relationship to their Line Manager by 31 August 2025, even if the relevant responsibility for the student has ended.

7.5 If a member of staff is in an intimate or any close personal relationship with a student for whom they do not currently have any direct or indirect academic responsibilities, or other direct professional responsibilities, but where it would be reasonable to assume that the member of staff may in the future have responsibility for the student (for example where a member of staff and student are in the same faculty); the relationship should be disclosed to the Line Manager to assess the risk of any conflict of interest arising and put appropriate alternative and/or protective measures in place as necessary.

7.6 If it is found this Policy is breached unintentionally, for example where a member of staff is unaware that the other party is a student, and had no reasonable basis to suspect it, the member of staff should inform their Line Manager as soon as they become aware of the situation. If a member of staff is unsure whether a relationship with a student should be disclosed under this Policy, the member of staff should disclose it.

7.7 The process for making a declaration is set out at section 10 below. Once declared, a conflict of interest management plan will be put in place.

7.8 When working with students, staff should:

- maintain a professional and appropriate physical and emotional distance;
- perform their duties in the best interests of the Company without favour towards or bias against any individual student;
- always use Company email account, telephone, applications and internet access for electronic communications with students;
- communicate with students in a professional manner at all times;
- avoid communicating with students via personal accounts, e.g. personal telephone, email, or social media accounts, and avoid giving their personal mobile phone number to a student or asking students for their personal details;
- refrain from contacting students outside of normal working hours;
- refer students with support needs to a relevant Company support service, limiting their own role in providing personal support to that for which they are trained and employed;
- not seek personal information from a student except as relevant to the Company's process (e.g. arranging appropriate pastoral support);

- where possible, ensure that meetings and discussions occur on campus; and
- adhere to the same guidelines when participating in events, fieldwork, attending conferences and any other Company activities whilst away from campuses.

8. Relationships between members of staff

8.1 Relationships between members of staff are not prohibited. However, in order to prevent potential abuse of power or conflict of interest, whether perceived or real, staff must declare close personal or intimate relationships in either of the following situations:

- i. Where a relationship develops that may give rise to a real or perceived conflict of interest, exploitation, favouritism or bias (for example, between a member of staff and their Line Manager); or
- ii. Where a relationship already exists, and a new situation arises that might give rise to a real or perceived conflict of interest, exploitation, favouritism or bias (for example, where two staff members in a relationship who work in different departments move to work in the same department).

8.2 The process for making a declaration is set out at section 10 below. Once declared, a conflict of interest management plan will be put in place. Failure to declare such a relationship may result in an investigation under the Company's disciplinary Policy.

8.3 In order to maintain appropriate relationships with colleagues and peers, and help reduce the risk of abuse of power or conflict of interest, staff should:

maintain an appropriate physical and emotional distance from other staff while working;

- perform their duties in the best interests of the Company without favour towards, or bias against, any individual staff member;
- use their Company email account, telephone, applications and internet access for work-related communications with staff;
- establish boundaries between professional and non-professional communication with colleagues;
- refer colleagues with support needs to a relevant GBS support service, such as occupational health or our employee assistance programme and limit their role in providing personal support where this is not part of their employment duties; and
- adhere to the same guidelines when participating in social events, conferences and other Company activities away from campuses.

9. Close Personal Relationships

9.1 The Company does not seek to discourage positive relationships between staff members and staff and students, and it may be appropriate for staff members and staff and students for whom they have responsibility to jointly participate in informal, social or leisure activities, providing careful consideration is given to potential conflicts, professional norms and boundaries and to how any such behaviour might be perceived.

9.2 Staff must be mindful of professional boundaries in all relationships with colleagues and students and must act in a way which safeguards student welfare and ensures standards of academic integrity are upheld. Even where a staff member does not have and is not likely to have responsibility for a staff member or student, staff should be very aware of and consider the potential for an actual or perceived imbalance of power or authority, accusations of bias or exploitation, and questions about the nature of consent, before embarking on an intimate or close personal relationship with a student or another staff member. The risks of such are likely to be heightened where there is a significant age difference between members of staff and staff member and the student.

9.3 It is impossible to cover every potential situation which might involve, or be perceived to involve, transgression of the boundaries of professional conduct but any relationship which involves (or is perceived to involve) any of the following characteristics will be considered to do so and must be declared:

- i. any form of dependence, whether emotional, practical, financial or otherwise, and whether the student or staff member appears dependent on the member of staff; or
- ii. favouritism towards any student or staff member (which might include, for example, circumstances where a student or staff member is treated in a way that is exclusive or exceptional).

9.4 If there is any uncertainty, the best course is to declare a relationship, or any interaction with a student or staff member that is of concern, so that appropriate measures (to protect both the student and the member of staff) can be considered.

10. Declaration of Personal Relationships

10.1 All declarations are to be made as soon as reasonably practicable and always within one month of joining the Company or the relationship arising, whichever is the latter. Failure to declare such a relationship will be considered a disciplinary matter.

- 10.2 Declarations should be made by completing the Personal Relationship Declaration Form in Appendix 1. This form should be completed even if the relationship was previously declared informally or via another method.
- 10.3 The declaration form should be submitted to Human Resources (HR), to the Line Manager(s) of the members of staff involved and, if a student is involved, to the Dean of Students.
- 10.4 HR, in consultation with the Line Manager(s) and relevant Head(s) of Department, will review the declaration and determine what actions, if any, are required to address any potential conflict of interest or other concerns arising. The actions will be documented on the form and copies provided to the relevant parties.
- 10.5 When a relationship ceases to exist, or the circumstances materially change, the form should be updated accordingly.
- 10.6 As the declaration contains special category data it will be stored securely and managed in compliance with data protection legislation. Such declarations will be treated respectfully, sensitively and confidentially, and the wishes of both parties respected as far as is reasonably possible.
- 10.7 Declarations will not be kept for longer than is necessary to support the management of any agreed actions. In normal circumstances they will be destroyed within one month of the ending of the relationship or, for example, if the people involved cease to be members of GBS community.
- 10.8 Staff who are unsure whether they have a personal relationship with a student or staff member should seek advice from their Line Manager, Head or Director of Department or from HR.
- 10.9 Students who are unsure whether they have a personal relationship with a staff member should seek advice from their Student Success Tutors or Welfare Team.

11. Malicious or Vexatious Complaints

- 11.1 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.

11.2 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.

11.3 If it is found that a person has made a complaint that is malicious or vexatious, the Company may instigate a disciplinary process against them. Disciplinary action will not be taken, however, if the matter is mistaken or otherwise ill-founded but not malicious or vexatious.

12. Policy Amendment and Administration

12.1 This Policy may be amended by GBS at any time. If there are any queries relating to Policy administration, please contact the Governance Office at governance@globalbanking.ac.uk

13. Data Protection and Confidentiality

13.1 GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioner's website](#). GBS as a Data Controller implements appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

14. Alternative Format

14.1 This Policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Governance Office at governance@globalbanking.ac.uk.

Appendix 1: Personal Relationships Declaration Form

SECTION A: DECLARATION

This form should be completed in accordance with the Policy on Consensual Relationships. All parties to a relationship should complete their own copy of this declaration.

Students: Please complete this form and send it securely to the Welfare Support Team.

Staff: Please complete this form and send it securely to HR and your Line Manager.

Your Details	
Name:	
Status:	☐ Staff Member ☐ Student
Line Manager:	
Student number:	
Other party['s/ies'] details (expand as necessary)	
Name	
Status:	☐ Staff Member ☐ Student
Line Manager:	
Student number:	
Nature of Relationship (expand as necessary)	
Date relationship started (approx.):	
Summary of relationship:	

I understand that:

1. it may be necessary for permanent or temporary adjustments to be made to any supervisory arrangements or other conditions, to remove any real or perceived conflict of interest arising from the relationship; and
2. this information will be stored securely and managed in compliance with the Policy on Consensual Relationships and applicable data protection legislation.

Signed: _____

Date: _____

SECTION B: AGREED ACTIONS

To be completed by HR in consultation with relevant Line Manager(s) and Head(s) of Department as applicable.

Conflict of Interest Management Plan (expand as necessary)	
Reasons for recommended plan:	
Details of recommended plan:	
Any further action required: (e.g. to address concerns raised under this or other policies)	

Signed: _____

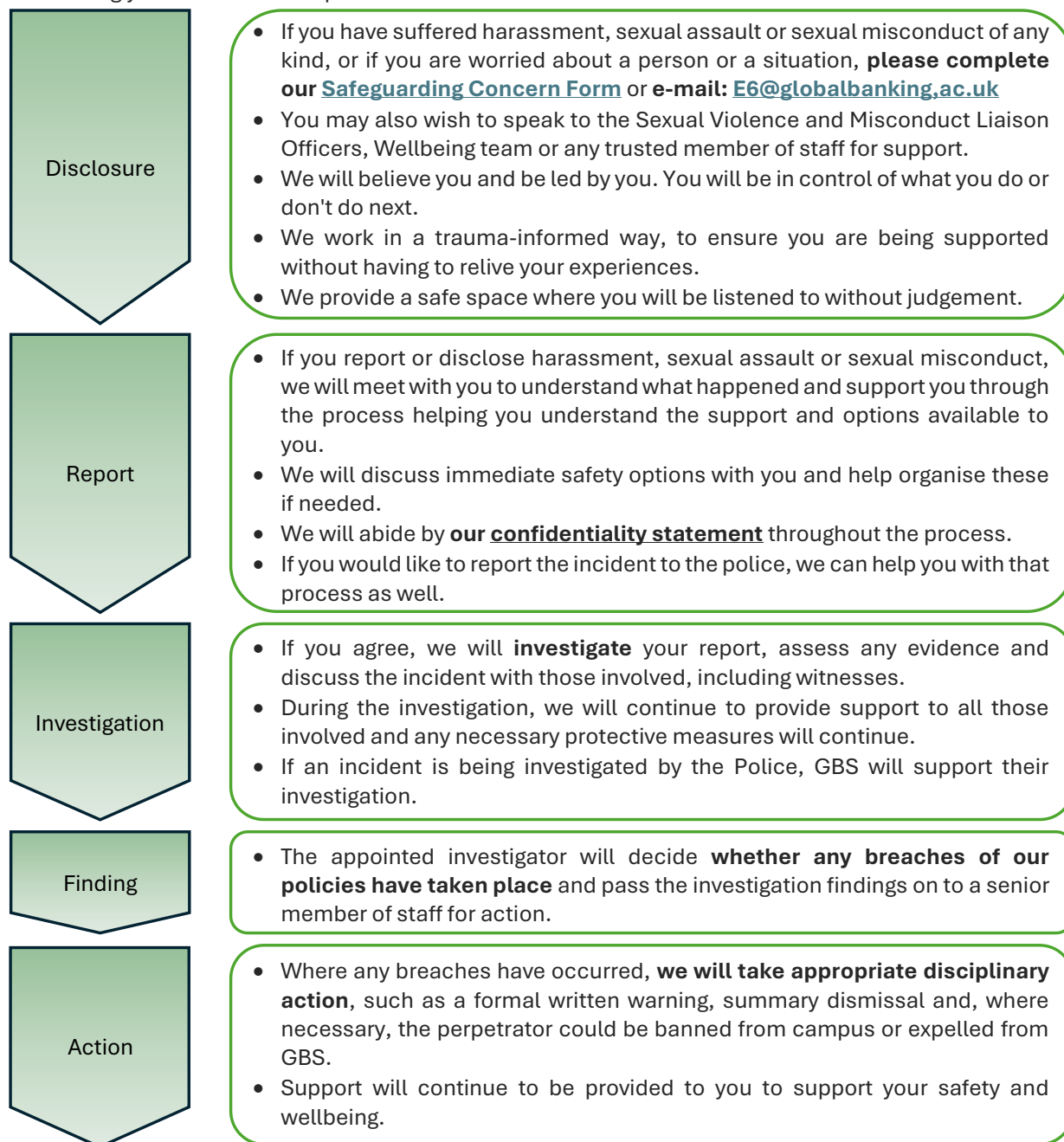
Name: _____

Job Title: _____

Date: _____

Appendix 2: Reporting Sexual Misconduct, Assault and Harassment - Student Guide

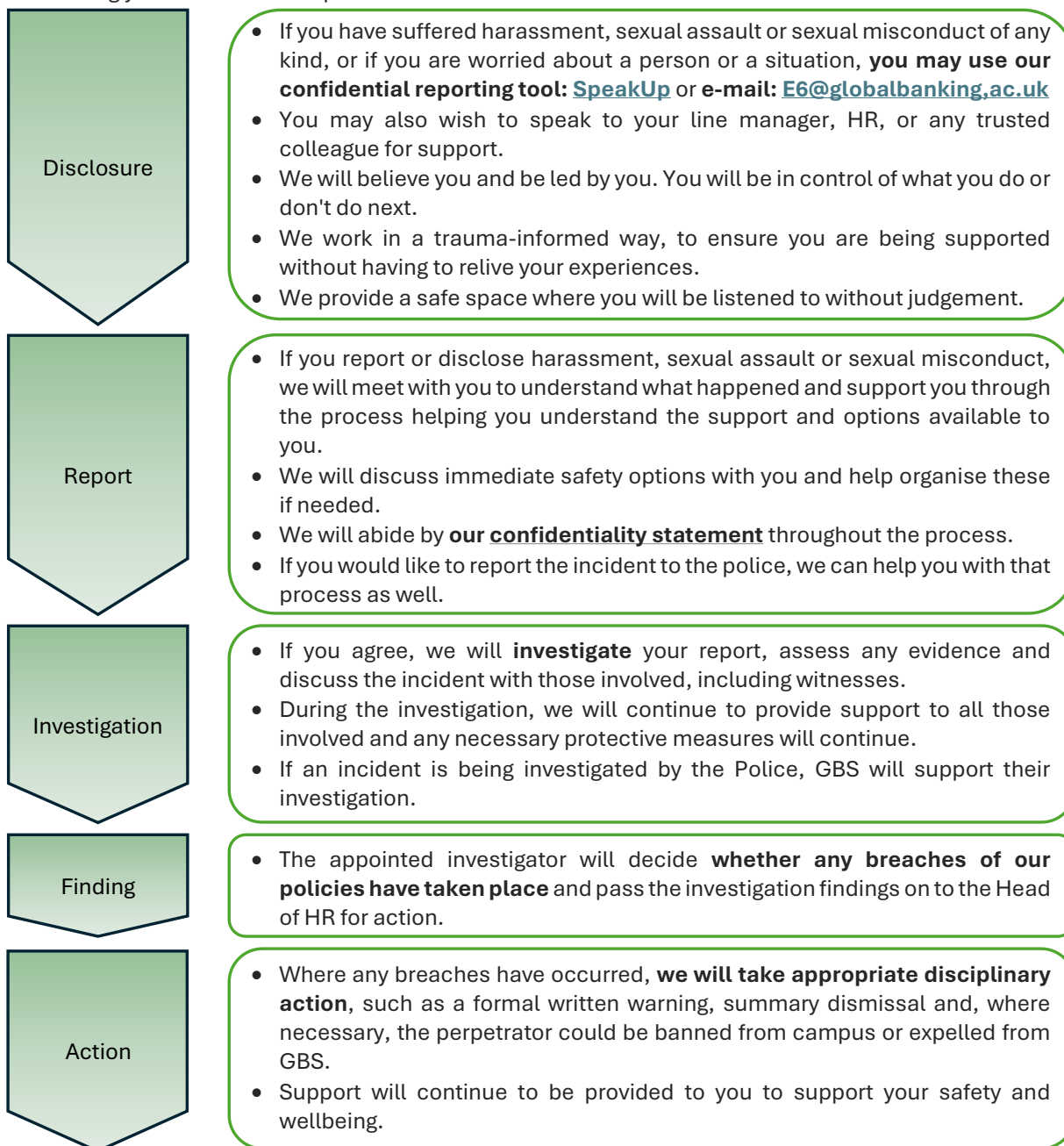
GBS is committed to providing a positive and safe environment for all students and staff to study, live and work. We will not tolerate any form of sexual assault or sexual misconduct. Please remember, physical contact does not necessarily need to have happened for you to raise a concern or a question about something you have seen or experienced.



This is a summary only. For full details, please access the relevant policies on the [Sexual Misconduct, Harassment and Consensual Relationships](#) policy web page.

Appendix 3: Reporting Sexual Misconduct, Assault and Harassment - Staff Guide

GBS is committed to providing a positive and safe environment for all students and staff to study, live and work. We will not tolerate any form of sexual assault or sexual misconduct. Please remember, physical contact does not necessarily need to have happened for you to raise a concern or a question about something you have seen or experienced.



This is a summary only. For full details, please access the relevant policies on the [Sexual Misconduct, Harassment and Consensual Relationships](#) policy web page.

[Anti-Harassment and Anti-Bullying Policy and Procedure.pdf](#)

[Staff Grievance Policy](#)

[Staff Disciplinary Policy](#)