



Personal Relationships Policy (HE)

Version	1
Owner	Quality and Standards Committee
Approving body	Board of Directors
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See Appendix A for version history

Personal Relationships Policy (HE)

1. Purpose

- 1.1. Boomsatsuma Education Ltd ('Boomsatsuma') recognises the importance of preserving the integrity of professional relationships between staff and students, and between members of staff, and to prevent abuse of power.
- 1.2. This Policy sets out expectations in relation to intimate personal relationships and other relevant relationships, and establishes requirements for disclosure and management where a conflict of interest or risk of abuse of power may arise. This includes a ban on intimate personal relationships between relevant staff members and students.
- 1.3. This Policy should be read alongside Boomsatsuma's Harassment and Sexual Misconduct Policy (HE) [\[Link\]](#).

2. Scope

- 2.1. This Policy applies to relationships involving a relevant staff member and a student registered on a higher education course delivered by Boomsatsuma. It also applies to relationships between members of staff engaged in higher education provision where a professional or supervisory relationship exists.
- 2.2. It also applies where a family relationship exists between a member of staff and a student and gives rise to, or could reasonably be perceived to give rise to, a conflict of interest.
- 2.3. It further applies where a personal relationship exists between a member of staff and a third party, including clients, customers, contractors, or suppliers, where this gives rise to, or could reasonably be perceived to give rise to, a conflict of interest.

- 2.4. These provisions apply in the context of Boomsatsuma's higher education provision.

3. Definitions

- 3.1. The definitions set out below are aligned with Office for Students (OfS) Condition E6.11.
- 3.2. '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 may result in the student doing something, or refraining from doing something, that they may not otherwise have done, and where that action or inaction could reasonably result in something that falls within the scope of an intimate personal relationship. An abuse of power may also arise where a member of staff exploits a position of authority in relation to another member of staff over whom they have line management or other professional responsibilities, in a way that applies pressure or influence and could reasonably result in comparable outcomes.
- 3.3. 'Excluded relationships' means any ongoing intimate personal relationship that existed before the introduction of this Policy and remains in existence, or that existed before the staff member became a relevant staff member in relation to that student.
- 3.4. 'Intimate personal relationship' means a relationship that involves physical intimacy, including isolated or repeated sexual activity, and/or romantic or emotional intimacy.
- 3.5. 'Relevant staff member' means a member of staff who has direct academic, professional, or pastoral responsibility in relation to a student on a higher education course delivered by Boomsatsuma.

4. Intimate Personal Relationships between Staff and Students

- 4.1. Staff are prohibited from entering into an intimate personal relationship with a student where they are a relevant staff member in relation to that student. This includes where the staff member has responsibility for the student's, or potential student's, admission, teaching, assessment, supervision, pastoral care, or wellbeing or mental health support, or is expected to have such responsibility during the course of the student's study.
- 4.2. This prohibition does not normally apply where a member of staff's primary status is as a student who also undertakes casual or part-time work for Boomsatsuma. However, it does apply where that individual has teaching or supervisory responsibility for other students.
- 4.3. Where an intimate personal relationship meets the definition of an excluded relationship, it is not prohibited under this Policy but must still be disclosed. This will enable Boomsatsuma to take appropriate steps to manage any actual or potential conflict of interest or abuse of power. Excluded relationships that are disclosed on or after 1 August 2025, the date on which OfS Condition E6 came into force for registered providers, will be recorded, with confirmation that they meet the definition of an excluded relationship.
- 4.4. Where an intimate personal relationship exists in circumstances where it is prohibited under this Policy, the staff member must disclose the relationship without delay to the HR Manager or Head of Higher Education so that appropriate action can be taken. Any such disclosure will be handled sensitively and in confidence, and appropriate support will be offered to those involved.
- 4.5. Following disclosure, it is the responsibility of the HR Manager and Head of Higher Education to ensure that appropriate alternative arrangements are put in place in relation to admissions, teaching, assessment, supervision, pastoral care, and/or wellbeing support, in order to prevent or address any actual or perceived abuse of power. Internal or external advice may be sought to

ensure that actions taken are proportionate and that those involved are appropriately supported.

- 4.6. Disclosures will be handled promptly and with due regard to confidentiality, dignity, and the wellbeing of those involved. Appropriate steps will be taken to ensure that any risks arising from the relationship are identified and managed effectively.
- 4.7. Failure to disclose an intimate personal relationship covered by this Policy may result in formal investigation under staff disciplinary procedures and may lead to disciplinary action, up to and including dismissal.
- 4.8. To support effective oversight and alignment with Office for Students (OfS) Condition E6, Boomsatsuma will maintain a confidential register of disclosed intimate personal relationships between relevant staff members and students to ensure appropriate provider oversight and management.

5. Intimate Personal Relationships between Members of Staff

- 5.1. Where an intimate personal relationship exists or develops between members of staff who are also in a supervisory, managerial, or other professional relationship, this must be disclosed without delay to the HR Manager or Head of Higher Education.
- 5.2. Any such disclosure will be handled sensitively and in confidence, and appropriate support will be offered to those involved.
- 5.3. Following disclosure, it is the responsibility of the HR Manager and Head of Higher Education to take appropriate steps to ensure that any actual or potential conflict of interest, unfair advantage, or abuse of power is prevented or addressed. This may include changes to line management responsibilities or involvement in recruitment, appraisal, promotion, or other decision-making processes.

- 5.4. Failure to disclose a relevant intimate personal relationship may result in formal investigation under staff disciplinary procedures and may lead to disciplinary action, up to and including dismissal.
- 5.5. Where a conflict of interest arises in connection with a formal or informal complaint involving a member of staff with whom another member of staff has an intimate personal relationship, that member of staff must not be involved in handling the matter. The complaint must be referred without delay to an appropriate senior member of staff, such as the Head of Higher Education or Director of Education.

6. Family Relationships Between Staff and Students

- 6.1. Where a member of staff has a family relationship with a student, including where the student is a parent, sibling, or other close relative, this must be disclosed where it gives rise to, or could reasonably be perceived to give rise to, a conflict of interest.
- 6.2. Any such disclosure must be made without delay to the HR Manager or Head of Higher Education and will be handled sensitively and in confidence.
- 6.3. Following disclosure, it is the responsibility of the HR Manager and Head of Higher Education to take appropriate steps to ensure that the student is treated fairly and is not advantaged or disadvantaged as a result of the relationship. In particular, the member of staff must not have any involvement in the formal assessment of the student, including marking, moderation, or local decision-making, recommendations or advice relating to academic progression or awards.
- 6.4. Where necessary, alternative arrangements will be put in place to ensure that teaching, assessment, supervision, and student support are conducted impartially and without any reasonable perception of bias.

- 6.5. Failure to disclose a relevant relationship may result in formal investigation under staff disciplinary procedures and may lead to disciplinary action, up to and including dismissal.

7. Personal Relationships with Third Parties

- 7.1. Where a member of staff has a significant personal relationship with a client, customer, contractor, or supplier, including but not limited to relationships of an intimate, family, or financial nature, this must be disclosed where it gives rise to, or could reasonably be perceived to give rise to, a conflict of interest. A conflict of interest may arise where the member of staff is in a position to influence decisions relating to the selection of, or terms agreed with, that third party.
- 7.2. Any such disclosure must be made without delay to the staff member's line manager and will be handled sensitively and in confidence.
- 7.3. Following disclosure, appropriate steps will be taken to ensure that any actual or potential conflict of interest is prevented or addressed. This may include removing the staff member from decision-making processes involving the third party, or making alternative arrangements to ensure that decisions are taken impartially.
- 7.4. Failure to disclose a relevant relationship may result in formal investigation under staff disciplinary procedures and may lead to disciplinary action, up to and including dismissal.

8. Recording and Monitoring

- 8.1. Disclosures made under this Policy will be handled sensitively and in confidence and will be shared only on a need-to-know basis.
- 8.2. Boomsatsuma will maintain a confidential register of disclosures made under this Policy in order to support the effective recording and management of

conflicts of interest, to prevent and address risks related to the abuse of power, and to ensure appropriate provider oversight.

- 8.3. The confidential record of disclosures maintained under this Policy will be handled in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- 8.4. Personally identifiable information contained within this record will not be disclosed in response to Freedom of Information (FOI) requests and will only be disclosed in response to a Subject Access Request (SAR) where the requester is entitled to access their own personal data, subject to applicable exemptions and legal considerations.

9. Review

- 9.1. This Policy will be reviewed periodically by the Quality and Standards Committee to ensure it remains aligned with relevant legislation, regulatory expectations, and provider practice.

Appendix A – Version History

Version	Date	Changes
1	10 June 2026	New draft