

## Professional Boundaries and Personal Relationships Policy

*Note: this policy sets out the obligations on colleagues in relation to their engagement with students*

### 1. Policy statement and principles

- 1.1 At the University of Westminster, diversity, inclusion and equality of opportunity are at the core of how we engage with students, colleagues, applicants, visitors and all our stakeholders. We are fully committed to enabling a supportive and safe learning and working environment which is equitable, diverse and inclusive, is based on mutual respect and trust, and in which harassment and discrimination are neither tolerated nor acceptable.
- 1.2 This Policy sets out the obligations on colleagues in relation to their engagement with students, including in relation to personal relationships between colleagues and students.
- 1.3 Whilst appropriate social interactions between colleagues and students can be a positive and desirable aspect of University life, it is important that they are subject to appropriate boundaries. The University recognises that where those boundaries are not observed, this risks the creation of actual or apparent conflicts of interest, favouritism, abuse of power, coercion, detriment or unfairness.
- 1.4 The University recognises that any information relating to personal, family or business relationships between colleagues and students may be private and sensitive. Accordingly, any information relating to such matters that is shared with the University under this Policy will, where appropriate, be treated as confidential and will be processed only in accordance with applicable data protection legislation in force from time to time.

### 2. Definitions

- 2.1 For the purposes of this Policy:
  - 2.1.1 'colleagues' (or 'staff') means all employees of the University. The principles set out in this Policy also apply (as specifically qualified) to individuals engaged by, or holding an office or post with, the University who do not have employment status. This may include, but is not limited to, workers, honorary staff, emeritus staff, volunteers, agency staff, contractors, consultants and University governors (hereafter 'non-employees'). For the purposes of this Policy, colleagues may include prospective employees/non-employees who are taking part in a University recruitment or appointment process;
  - 2.1.2 'students', unless specifically qualified otherwise, means any person pursuing a course, module or programme of study or research offered by the University, whether or not currently in attendance, suspended, interrupted, or on placement or overseas study. It includes students who have accepted an offer of a place on a programme of study or research and as such have entered into a contract with the University but who have not yet completed the formal enrolment processes. Where a student also undertakes work for the University, that individual will be treated as both a colleague and a student for the purposes of this Policy, commensurate with their respective roles;
  - 2.1.3 'intimate personal relationship' between a student and colleague means any relationship that involves one or more of the following elements: 1) physical intimacy including isolated or repeated sexual activity; or 2) romantic or emotional intimacy. This will include any such relationship, however brief, and whether conducted in person or remotely (for example, via social media, email or text messaging);
  - 2.1.4 'direct professional colleague/student relationship' means a relationship between a relevant colleague and a student where the colleague has, or has the potential to have, direct academic, pastoral or administrative responsibility for the student, including where that relationship arises, or may arise from time to time, from a discrete or time-limited area of responsibility (including, for example, an academic course or module, a research project, an

event or field trip or in connection with the provision of student services such as finance, immigration, accommodation or wellbeing support). Academic responsibilities include, but are not limited to, teaching, supervision and assessment, and pastoral or administrative responsibilities will include, but are not limited to, providing mental health advice, operating a student complaint process and providing other forms of support, advice or guidance to a student, or having responsibility for student admission and right to study matters, student finance or student accommodation;

- 2.1.5 'relevant colleagues' includes, but is not limited to: teaching colleagues, such as lecturers, senior lecturers, principal lecturers, readers, professors and PTVLs ; dissertation or project supervisors for taught postgraduate students or research students; personal tutors and pastoral support colleagues; senior colleagues with responsibility or oversight of wider institutional strategy, processes and delivery, for example, Vice-Chancellor/Deputy Vice-Chancellors; technical support colleagues, finance or administrative colleagues with responsibility for matters such as student accommodation, student admissions and student finance; and, security colleagues. It may also include a student who is also a colleague if, in their capacity as a colleague, they have direct academic responsibility or other direct professional responsibility for a student. A member of the University's cleaning or catering teams would not normally be a relevant colleague, unless they have direct professional responsibilities for a student;
- 2.1.6 'excluded relationships' means any ongoing intimate personal relationship between a colleague and a student that: 1) existed before 01 August 2025 and that remains in existence; or, 2) existed before the date that the colleague entered into a direct professional colleague/student relationship with the student;
- 2.1.7 'abuse of power' means a situation where a relevant colleague exploits a position of power in relation to a student so as to apply pressure in a way which: 1) may result in the student doing something, or refraining from doing something, that they may not have otherwise done; and, 2) that action or inaction could reasonably result in something that falls within the scope of an intimate personal relationship.

### **3. Observing professional boundaries**

- 3.1 The University requires colleagues to observe professional boundaries in all their interactions with students, whether professional or social.
- 3.2 Professional boundaries describe the limits of an appropriate colleague/student relationship. They reflect the nature of that relationship, including the duties owed by the colleague to the student and the power imbalance that will typically exist between them.
- 3.3 In most circumstances, the professional boundaries that must be observed by colleagues with students will be clear. It is clear, for example, that digital communications between colleagues and students are expected to be conducted through the University's standard communication systems e.g. MS Teams, BlackBoard, University email etc, and not through the use of personal messaging, personal social media channels or the exchange and use of personal mobile numbers and/or email addresses. However, it is recognised that there will be some areas in relation to which guidance may assist to clarify the University's requirements of colleagues. Below is a non-exhaustive list of example behaviours by colleagues when engaging with students that the University would regard as being beyond these professional boundaries and which could be construed as inappropriate sexual and/or romantic advances. Where a relevant colleague is in a direct professional colleague/student relationship with the subject of that behaviour, such behaviours could also amount to an abuse of power or coercion.
  - 3.3.1 Social interactions:
    - 3.3.1.1 an invitation made by a colleague to a student to meet socially – whether in an environment in which alcohol may be served or consumed, or not - on a one-to-one basis (rather than as part of a larger group);

- 3.3.1.2 suggestive or flirtatious behaviour or comments by a colleague towards a student (including, but not limited to, the use of sexual language or making comments about the student's appearance), whether in person or through digital media (e.g. social media and messaging platforms), telephone and/or email;
    - 3.3.1.3 uninvited physical contact with a student by a colleague (including touching of the student) and/or a colleague failing to maintain appropriate physical distance from a student.
  - 3.3.2 Teaching and supervision (e.g. PhD, dissertation etc):
    - 3.3.2.1 conducting or proposing to conduct teaching / supervision activities in what may reasonably be regarded as an inappropriate location or environment for such activities (this might include, for example, the student's or colleague's home);
    - 3.3.2.2 whether in person or via online/electronic communications (including, but not limited to, non-University-based social media/messaging channels) pressurising the student to engage in teaching / supervision activities outside what may reasonably be regarded as appropriate hours/days for such activities;
    - 3.3.2.3 sharing with, or trying to solicit from, the student information of a personal nature which is unnecessary for the purpose of the teaching / supervision relationship;
    - 3.3.2.4 any behaviour by the colleague in the context of their teaching / supervision relationship with a student that is, or may be perceived by others, as favouritism towards the student, including, for example, making comments to the student that are critical of other students;
    - 3.3.2.5 any actions by the colleague in the context of their teaching / supervision relationship with a student which treats the student less favourably as a result of the student rejecting or submitting to improper conduct by the colleague.
  - 3.3.3 Off-campus professional activities:
    - 3.3.3.1 unprofessional behaviour, for example as described by the non-exhaustive list of behaviours from 3.3.1 – 3.3.2, by a colleague towards a student during field trips, conferences and other professional events/activities that are attended by both colleagues and students. For the avoidance of doubt, such behaviours would be deemed inappropriate if engaged in by a colleague when conducting off-site professional activities.
- 3.4 Where a student believes that they are being, or have been, subject to a breach of professional boundaries, whether or not that behaviour could also amount to an abuse of power or coercion, they are entitled to challenge that behaviour (for example, by refusing to agree to an inappropriate request or invitation). The student is also encouraged to report such behaviour to the University. Section 7 provides further information about how students may report concerns and/or access support in relation to such matters.

#### **4. Intimate personal relationships between colleagues and students**

- 4.1 The University prohibits intimate personal relationships between colleagues and students (as defined in 2.1.3) where:
- 4.1.1 the student is under the age of 18 or a vulnerable adult (as defined in the University's Safeguarding Framework, as amended from time to time);
  - 4.1.2 the colleague has a direct professional colleague/student relationship with the student (as defined under 2.1.4) and the relationship is not an excluded relationship (as defined under 2.1.6); or
  - 4.1.3 there are other factors that may indicate a risk of the relationship giving rise to an actual or apparent conflict of interest or favouritism, abuse of power, detriment or unfairness to the interests of the student.
- 4.2 Any individual who is in an intimate personal colleague/student relationship and who is unclear whether it may be a prohibited relationship as defined in paragraph 4.1, or who has any other concerns regarding how the relationship may impact on their role and responsibilities as a colleague and/or student of the University, should seek guidance on the matter in accordance with section 7 of this Policy.
- 4.3 A student will not be penalised by the University for participating in a relationship with a colleague, whether or not it is prohibited by this Policy.
- 4.4 Where an intimate personal relationship between a student and colleague ends, any future contact or engagement between the parties must be conducted by the colleague in a professional manner which does not impact adversely on the student (or on other colleagues or students). The University will not tolerate any bullying, harassment, victimisation or other detrimental treatment by a colleague towards a student under any circumstances, including where that treatment arises from the ending of an intimate personal relationship between those individuals.

#### **5. Family or business relationships**

- 5.1 Colleagues must disclose any family or business relationship they have, or have had, with a student with whom they also have a direct professional colleague/student relationship. Any such family or business relationships that existed before the implementation of this Policy must also be disclosed, whether or not such relationships are continuing.
- 5.2 The University may take appropriate steps to prevent any actual or apparent conflict of interest, favouritism, abuse of power, unfairness or detriment arising from such a relationship. Colleagues will be required to cooperate with the University in the implementation of appropriate arrangements. Any students who may be affected by the implementation of new arrangements will be offered appropriate support to ensure that the impact on them of any such changes is minimised.
- 5.3 Where the duty to disclose under this section 5 is engaged, responsibility for the disclosure lies with the colleague. Where a student is a party to the relationship, they are also strongly encouraged to make a disclosure so that the University can ensure that it is taking appropriate steps to support that student and minimise any risks to them that may arise from that relationship.
- 5.4 To disclose a family/business relationship, colleagues should complete the form attached as an appendix to this Policy. Where a student also wishes to disclose such a relationship they should complete their own copy of the form. Completed forms should be sent securely to the following:
- 5.4.1 Forms completed by colleagues should be sent to their Head of School/Professional Services Director and People Business Partner (or, for non-employees, the person to whom they report at the University).
  - 5.4.2 Forms completed by students should be sent to [academicstandards@westminster.ac.uk](mailto:academicstandards@westminster.ac.uk).

- 5.5 Disclosure must be made as soon as reasonably practicable and no more than 30 calendar days after the start of the relationship or the implementation of this Policy.
- 5.6 Any individual who is unclear whether they have, or have had, a family or business relationship for the purposes of this Section 5 should seek guidance on the matter in accordance with section 7 of this Policy.

## **6. Breach of this Policy**

- 6.1 The following will all be treated as potential disciplinary matters which, if found to have occurred, could result in disciplinary action against a colleague, up to and including dismissal:
  - 6.1.1 conducting an intimate personal relationship that is prohibited under this Policy; and/or
  - 6.1.2 failing to disclose a family or business relationship where required by and in accordance with this Policy; and/or
  - 6.1.3 failing to observe professional boundaries contrary to section 3 of this Policy; and/or
  - 6.1.4 behaving inappropriately following the end of a personal relationship in accordance with section 4.4.
- 6.2 For non-employees who are not subject to the University's Disciplinary Policy and Procedure, the University may (having regard to the terms of any applicable contract, guidelines or other terms governing their relationship with the University) take whatever action it deems appropriate in the event of a breach by them of the terms of this Policy, which may include the termination of the relationship with the University.

## **7. Support and guidance**

- 7.1 Guidance on the terms and application of this Policy, and wellbeing support in relation to the issues addressed in the Policy, are available to University colleagues and students.
- 7.2 Colleagues should contact the [People Advisory Support](#) team whilst students should contact [student-wellbeing@westminster.ac.uk](mailto:student-wellbeing@westminster.ac.uk) for further information regarding the guidance and support that is available.
- 7.3 Should a student wish to report any behaviour by a colleague that they believe may be in breach of this Policy, they should use the [Report and Support](#) platform in the first instance.
- 7.4 Where a student wishes to raise a concern regarding the behaviour of a colleague with whom they are in an intimate personal relationship (for example, relating to harassment or sexual misconduct), they may use the [Report and Support](#) platform *and/or* do so through the [Student Complaints Procedure](#). Students are encouraged to report and seek support for harassment or sexual misconduct that occurs within a relationship with a colleague, regardless of whether that relationship is permitted under this policy. Students should be reassured that a colleague who is the subject of a concern raised by them will have no involvement in the consideration of the matter.
- 7.5 A colleague who is the subject of a complaint must not retaliate against the student who has raised it. Where retaliation occurs, it will be treated as a disciplinary matter which, if found to have occurred, could result in disciplinary action against the colleague, up to and including dismissal.

## **8. Monitoring and Review**

- 8.1 The Policy was introduced in August 2022, and updated in August 2025, after consultation with the University's recognised trade unions and after appropriate discussion with the University's Students' Union, Student Voice Forum and EDI Colleague Networks' Chairs.

- 8.2 This Policy is not incorporated into colleagues' contracts of employment. It will be reviewed periodically to ensure it continues to reflect legislative changes and that the approach set out in the Policy remains effective and appropriate in order to comply with OfS condition E6.5 (as amended from time to time). Any further changes made will be subject to prior consultation with the University's recognised trade union representatives and after appropriate discussion with the University's Students' Union and with any other representative groups and/or parties, as the University deems appropriate.

Agreed by the Resources Committee on: 19 June 2025

Approved by the Court of Governors on: 16 July 2025

Effective from: 1 August 2025

Review date: July 2028

### **Digital Accessibility**

We are committed to ensuring our websites and content is digitally accessible according to the Public Sector Bodies Accessibility Regulations (2018). This policy is published on our website; and can be requested in a range of formats e.g. Word, PDF, plain text, alternative formats such as large print or Braille.

To implement this policy, users are asked to access other digital information or systems. For information on the accessibility of this system, the University has published an accessibility statement for each system which outlines accessibility issues we're aware of and how we are working to address them. You can access this from the system. This policy relates to the following digital systems with the following levels of accessibility:

- SharePoint – partially accessible – [SharePoint Accessibility Statement](#)
- Microsoft – partially accessible - more on [Microsoft](#) (including support from the Microsoft Disability Answer Desk)
- Report + Support – partially accessible - [Report + Support accessibility statement](#)
- The University of Westminster website – partially accessible – [University of Westminster website accessibility statement](#)

If you need an alternative to using the system to implement the guidelines, please contact People Advisory Support or People Services on [HR-Services@westminster.ac.uk](mailto:HR-Services@westminster.ac.uk) and we will support you to do this.

This document has been designed to maximise usability - for example navigating by headings, meaningful hyperlinks, image descriptions, colour/contrast and display options such as magnification and reflow. Should you encounter an accessibility barrier, please report to People Advisory Support or People Services on [HR-Services@westminster.ac.uk](mailto:HR-Services@westminster.ac.uk)

## APPENDIX

### DISCLOSURE FORM

This form is to be used by colleagues when disclosing a **family/business relationship** with a student under the University's Professional Boundaries and Personal Relationships Policy (section 5).

The form may also be used by a student who wishes to disclose a family/business relationship with a colleague.

Please send completed forms securely to the appropriate contact identified in clause 5.4.

<b>Your details:</b>	
1. Name:	
2. Are you a student or a colleague?	
3. Position (if a colleague):	
4. College/School or Department (if a colleague):	
5. School or Course of Study (if a student):	
<b>Details of the other party to the relationship:</b>	
1. Name:	
2. Are they a student or a colleague?	
3. Position (if a colleague):	
4. College/School or Department (if a colleague):	
5. School or Course of Study (if a student):	
<b>Nature of relationship:</b>	
1. Please confirm the following: <ul style="list-style-type: none"> <li>a. where you have a family relationship with a student or colleague, the nature of your relationship with that individual</li> <li>b. where it is a business relationship, the nature of that business relationship</li> <li>c. if it is continuing</li> </ul>	

d. if it is not continuing, date when the relationship ended.	
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**I understand and agree to the following:**

1. The University may take appropriate steps to prevent or deal with any actual or apparent conflict of interest, favouritism, abuse of power, unfairness or detriment arising from the relationship disclosed in this form.
2. I have read and understood the University's Professional Boundaries and Personal Relationships Policy and I will cooperate in the implementation of any such arrangements.

Signed:

Print Name:

Date