ITALIA CONTI

Personal Relationships Policy

Policy Introduction

This policy explains Italia Conti's expectations in relation to personal relationships involving staff, students, freelancers, contractors and others working with or on behalf of Italia Conti.

Students should read this policy if they are concerned about staff-student relationships, professional boundaries, conflicts of interest, favouritism, abuse of power, inappropriate personal contact, or relationships that may affect teaching, assessment, casting, pastoral support, progression, references or access to opportunities.

This policy supports Italia Conti's approach to preventing conflicts of interest and protecting students from actual or potential abuse of power. It should be read alongside the Single Comprehensive Source of Information for OfS Condition E6, the Harassment, Sexual Misconduct and Sexual Violence Policy, and the Staff Code of Conduct.

Version control and archive note

This is the reference policy document that was most up to date at the time of publication of Italia Conti's Single Comprehensive Source of Information for OfS Condition E6: Harassment and Sexual Misconduct.

This document will be reviewed and updated in line with its normal policy review cycle. Where a newer version is approved, the Single Comprehensive Source and linked policy folder will be updated accordingly.

Archived copies of previous versions of this policy and the 'Preventing and Addressing Harassment, Sexual Misconduct and Violence' guide are available here.

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If you or someone else is in immediate danger, call 999

For support contact wellbeing@italiaconti.co.uk

ITALIA
CONTI

Personal Relationships Policy (Staff and Students)

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1. Policy Summary: Key Principles

Italia Conti is committed to creating and maintaining a safe and trusted professional working and learning environment for all participants. All members of Italia Conti have a responsibility for creating a community that is based on dignity and respect. This policy forms part of the Italia Conti's comprehensive framework for preventing and addressing harassment and sexual misconduct. It applies to close personal relationships between staff members or between members of staff and students.

This Policy is intended to provide clarity around personal relationships in the professional environment of Italia Conti and its activities, to ensure the protection of the Italia Conti community. Close personal relationships, when overlapping with professional responsibilities, may compromise the integrity of the individuals involved and undermine the good running and reputation of Italia Conti. The purpose of this policy is to address the risks associated with personal relationships between staff and students, with the objective of safeguarding students and staff from actual or perceived conflicts of interest, abuses of power, and any detrimental impact on their wellbeing or academic integrity, and to make reasonable efforts to limit the circumstances in which a position of power might be abused.

Italia Conti is committed to creating and maintaining a safe and trusted professional working and learning environment for all participants. All members of Italia Conti have a responsibility for creating a community that is based on dignity and respect. This policy forms part of the Italia Conti's comprehensive framework for preventing and addressing harassment and sexual misconduct in line with OfS guidelines and Condition E6.

For the purposes of this policy:

A member of staff means all permanent, temporary, and volunteer staff employed by the school, regardless of whether they are employed in an educational, artistic or other capacity.

A freelance contractor, which includes guest tutors, directors, choreographers, musical directors, stage management and other creatives must follow the guidance in this policy for staff members to protect their interests and ensure professional conduct and safeguarding practices are observed.

A student means any current diploma, undergraduate, taught postgraduate or postgraduate research student whether full time or part time, regardless of whether they study on campus, off campus or online. It includes students who have deferred or who are intermitting their studies, students on short courses, and prospective applicants applying to join the Italia Conti community as a student.

2. Aims

In line with guidance from the Office for Students, this policy aims to:

- protect students from conflicts of interest and abuse of power that can arise from personal relationships between staff and students.
- ensure the health, safety and wellbeing of all staff and students;
- promote better understanding of the difficult issues which may arise as a result of personal relationships between members of the Italia Conti community;
- support staff and students in addressing those issues and to access support where concerns arise; and

- protect the integrity of all students, staff members and Italia Conti itself from actual or perceived conflicts of interest.

Situations where a personal relationship might raise questions about a conflict of interest, trust and/or confidentiality could include:

- all aspects of teaching, learning and research;
- all aspects of student wellbeing, including the pastoral support of students;
- access to student services including financial assistance, accommodation and other services;
- management and supervision of staff, including career progression and staff development;
- allocation of financial and other resources 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.

3. Definitions

Italia Conti refers to Personal Relationships as follows:

- **Intimate Personal Relationship:** A consensual relationship involving romantic, sexual, or close emotional intimacy. *
- **Close Personal Relationship:** a close personal relationship involving a relative, close family friend, close friend or a relationship where there is financial dependence.
- **Professional Responsibility:** Any role in which a staff member has influence over a student's academic progress, assessment, pastoral care, disciplinary matters, or access to institutional services.

***Please note:** This Policy deals primarily with intimate personal relationships that are consensual. An intimate relationship where consent is not present or where consent is undermined by, for example, coercion or an abuse of power, will not be tolerated and will be addressed by Italia Conti under its Harassment, Sexual Misconduct and Sexual Violence Policy or the Staff Sexual Harassment Policy.

If you have suffered a sexual assault, sexual misconduct, or harassment, or if you have concerns about a person or a situation, please raise the matter with us as follows:

Students: Report to the Wellbeing Lead, who is also the Designated Safeguarding Lead: safeguarding@italiaconti.co.uk

Staff: Report to the Director of HR: HR@italiaconti.co.uk

4. Policy Principles

Staff members hold a 'position of trust' and authority, and therefore have a responsibility to uphold this position and ensure it is not compromised;

Staff are expected to maintain a professional boundary when dealing with students both on site at Italia Conti and off-site, whether within or outside of working hours. It is always the responsibility of the staff member to ensure this boundary is maintained.

Similarly, students are expected to demonstrate professional behaviour throughout their time as a student both in Italia Conti and off-site, to respect the professional boundaries of staff, and to always abide by the Student Code of Conduct.

5. Prohibited Relationships

Under this Policy, the following relationships are expressly prohibited by Italia Conti:

- Intimate personal relationships between Italia Conti staff and students.
- Social media relationships between staff and students.

Staff are prohibited from entering into or continuing an intimate personal relationship with a student over whom they have, or may reasonably be perceived to have, professional responsibility.

The prohibition on a personal relationship between staff and students, including communication via social media, lasts for at least six months after the end of the academic year of the student's official end date of enrolment (even if the student in question has left early).

Students who are intermitting or deferring remain in scope if this policy as students.

6. Relationships between staff and students

The integrity of the professional 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.

The development of an undeclared personal relationship that compromises professional boundaries or impartiality may be deemed misconduct and referred for investigation under the staff disciplinary procedures. Staff are expected to respect professional boundaries and always abide by the Staff Code of Conduct.

Similarly, students are expected to demonstrate professional behaviour throughout their time as a student both in Italia Conti and off-site, to respect the professional boundaries of staff, and to abide by the Student Code of Conduct at all times.

- Personal relationships between staff and students are prohibited.
- Personal relationships other than family relationships between staff and students are unlikely to be appropriate but will be assessed on a case-by-case basis.
- Staff must declare any personal relationship with a student that exists or arises while they are a member of staff, to include past relationships which might have, or be perceived to have, an impact on their work.
- Students are also expected to declare such personal relationships with staff members.

The process for making a declaration is set out at section 9 below. Once declared, a conflict-of-interest management plan will be put in place.

7. Staff-student working relationships

Staff are expected to maintain a professional boundary when dealing with students both on site at Italia Conti and off-site, whether within or outside of working hours. It is always the responsibility of the staff member to ensure this boundary is maintained.

Staff are expected to

- maintain a professional and appropriate physical and emotional distance;
- perform their Italia Conti duties in the best interests of the institution without favour towards or bias against any individual student;
- always use an Italia Conti email account, telephone, applications and internet access for electronic communications with students;
- always communicate with students in a professional manner;
- refrain from 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;
- refer students with support needs to a relevant Italia Conti 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 an Italia Conti process (e.g. medical information for mitigating circumstances, or personal circumstances information as part of an academic progress process or appropriate pastoral support);
- where possible, ensure that meetings, tutorials and discussions occur on site or on Italia Conti video-conferencing platforms; and
- adhere to the same guidelines when participating in offsite events such as performances, attending any other Italia Conti off site activities.

Staff are reminded that it is a criminal offence for a person aged 18 or over to have a sexual relationship with a child under 18 where that person is in a position of power, even if the child is over 16 and the relationship is consensual.

Infatuations

On occasion, students may develop an infatuation for a member of staff. If a member of staff suspects or becomes aware of an infatuation, the advice of the Programme Leader and a member of the Senior Leadership Team must be sought immediately in order that appropriate steps can be taken.

Staff should deal with these situations sensibly and appropriately to maintain the dignity and safety of all concerned.

Relationships that begin after a student graduates or after a staff contract ends are not automatically prohibited but may still require disclosure where reputational or safeguarding risks remain.

8. Relationships between members of staff

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:

- 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
- 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).

The process for making a declaration is set out at section 9 below. Once declared, a conflict-of-interest management plan will be put in place.

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

- work in a professional manner, without favour towards or bias against, any individual staff member;
- use their Italia Conti email account, telephone, applications and internet access for work-related communications with staff;
- where appropriate, consider establishing boundaries between professional and non-professional communication methods with colleagues; e.g. separating personal and work relating messaging.

9. Relationships between students

Students are expected to treat each other collegiately, in line with the student code of conduct.

Italia Conti recognises that personal relationships may develop between students during their time at the institution. Whilst such relationships are not prohibited, all students are expected to maintain appropriate behaviour and respect personal and professional boundaries, in line with the Student Code of Conduct and other relevant policies.

Power dynamics can exist between students, for example, between different year groups, between older and younger students, or where one student holds a formal or informal position of influence (such as student reps). These dynamics may affect consent, inclusion, or wellbeing, and may be relevant where concerns arise.

Where a student-student give rise to safeguarding concerns, coercion, harassment, or inappropriate conduct, it will be managed under the Harassment, Sexual Misconduct and Sexual Violence Policy, the Safeguarding Policy, or the Disciplinary Procedure as appropriate.

Students are encouraged to report any concerns via safeguarding@italiaconti.co.uk or directly to Student Support Services.

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

10. Relationships with Contractors, Freelancers, and Suppliers

Staff must declare any close personal or close personal or intimate relationships with third-part individuals or organisations engaged by Italia Conti, including freelance tutors, guest teachers/artists, suppliers, or external service providers. This applies where the staff member has, or could reasonably be perceived to have, influence over selection, procurement, fees, scheduling, or access to institutional opportunities.

Declarations should be made where:

- A relationship predates the contractual engagement
- A relationship develops during the working relationship
- The relationship may present a conflict of interest, perceived bias, or reputational risk.

All such declarations will be reviewed under this policy and Italia Conti's Conflict of Interest Policy, which outlines expectations around impartiality, transparency, and the avoidance of undue influence. Where appropriate, a conflict management plan will be agreed with HR. This may include reassignment of responsibilities, appointment of an independent decision-maker, or ensuring an alternative point of contact.

11. Declaration and Management of Permitted Relationships and Conflicts of Interest

To help Italia Conti avoid and manage conflicts of interest that may compromise, obstruct or prevent any of its activities, and to help safeguard its staff and students, all staff members are required to disclose the following:

- any pre-existing personal relationships
- any relationships that develop beyond those that reasonably constitute a professional relationship in the normal course of employment or
- any relationships that exist where there may be potential for a conflict of interest to arise.

Relationships under this definition encompass those between colleagues, freelancers or suppliers and those between students, and might include:

- Italia Conti students who pay to attend external courses that staff deliver in studios elsewhere,
- students that staff have known in a personal or professional capacity prior to enrolling at Italia Conti (for example through Italia Conti Associates),
- relationships that develop between colleagues, relationships between staff and third-party suppliers and so on.

Additionally, staff members should declare

- Where there is a pre-existing intimate relationship with another member of Italia Conti staff;
- Where a staff member enters an intimate relationship with another member of Italia Conti staff;
- Where an intimate relationship exists between a staff member and a postgraduate student with no direct supervision.

Declarations should be made to the Principal, Chief Operating Officer or Director of Human Resources via email (HR@italiaconti.co.uk).

All declarations are to be made as soon as reasonably practicable and always within one month of joining Italia Conti or the relationship arising, whichever is the later.
Upon declaration Italia Conti will assess the risk of conflict of interest or potential for abuse of power, and implement **mitigation measures**, which may include:

- Reassigning teaching or supervisory duties.
- Restricting access to student records.
- Monitoring interactions where appropriate.
- All declarations will be recorded in a **confidential register** maintained by HR.

When a relationship ceases to exist, or the circumstances materially change, the form should be updated accordingly.

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.

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 the Italia Conti community.

12. Non-Compliance

- Failure to declare a relationship, or attempts to conceal it, may result in disciplinary action, up to and including dismissal.
- Students involved in undeclared relationships will not be penalised but will be offered **support and safeguarding**.

13. Safeguarding and Support

Students and staff can access confidential advice and support through:

- Student Support Services
- HR and Occupational Health
- The institution's Safeguarding Team

The institution will ensure that students involved in declared or undeclared relationships are not disadvantaged in their academic progress or wellbeing.

14. Training and Awareness

All staff and students will receive training on:

- Professional boundaries
- Recognising power imbalances
- Reporting and support mechanisms

Training will be refreshed **annually** and updated in line with regulatory changes.

15. Non-Disclosure Agreements

- Italia Conti has a zero-tolerance policy on harassment and sexual misconduct. We take allegations of possible breaches of this Policy and any allied policies very seriously and we are committed to transparency.
- In accordance with the Office for Students (OfS) Condition E6, Italia Conti does not use, enforce, or seek to rely on non-disclosure agreements (NDAs) or confidentiality clauses in any circumstances involving allegations of harassment or sexual misconduct, including those arising from intimate or personal relationships.

- Italia Conti is committed to ensuring that students and staff feel safe and supported in reporting concerns. No individual will be asked to sign an agreement that prevents them from speaking about their experiences, and any such clause will be considered null and void.
- This policy reflects our commitment to transparency, accountability, and the protection of the rights and wellbeing of all members of the Italia Conti community.

16. Monitoring and Review

This policy will be reviewed annually by the Italia Conti's Policy Steering Group.

- Historical versions of the policy will be **retained and accessible** in accordance with the OfS's **prominence principles**.

17. Related Policies

- Harassment, Sexual Misconduct and Sexual Violence Policy
- Staff Code of Conduct
- Staff Sexual Harassment Policy
- Student Code of Conduct
- Safeguarding Policy
- Appropriate Physical Contact and Safe Touch Policy
- Disciplinary Policy and Procedures
- Social Media Policy
- Equal Opportunities Policy
- Staff Grievance Policy
- Complaints Policy and Procedures
- Whistleblowing Policy
- Anti-Bullying Policy Statement
- Conflict of Interest Policy

Further guidance is also available in the Student Handbook and the Staff Handbook.

Appendix 1: Personal Relationships Declaration Form

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

Students: Please complete this form and send it securely to your Head(s) of Department.
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: _____