

Rambert School Personal Relationships Policy

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Equality and Diversity Considerations:	Policy should be available in accessible format for all students. When reviewing cases/disclosures, care should be taken to consider: intersectionality; power structures/imbances; individual personal contexts
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Further information:

This Policy is informed by the UniversitiesUK guidance 'Changing the culture: tackling staff to student misconduct':

https://www.universitiesuk.ac.uk/sites/default/files/field/downloads/2022-03/staff-to-student-misconduct-strategic-guide-02-03-22_0.pdf

Rambert School Personal Relationships Policy

Policy Summary: Key Principles

- *This policy covers the requirements and expectations of Rambert School with regard to close personal and intimate relationships between staff and students, and between colleagues.*
- *The purpose of this policy is to seek to protect students and staff from allegations of actual or perceived conflicts of interest, and to make reasonable efforts to limit the circumstances in which a position of power might be abused.*
- *Definitions relating to this policy (e.g. how the School defines 'close personal relationship' and 'intimate relationship') can be found in Section 3.*
- *'Staff members' means all permanent, temporary, freelance, guest and volunteer staff employed by the School, regardless of whether they are employed in an educational, artistic or other capacity.*
- *Staff members hold a 'position of trust' and authority, and therefore:*
 - *Staff have a responsibility to uphold this position and ensure it is not compromised;*
 - *The following relationships are prohibited by the School:*
 - *intimate relationships between School staff and students where students are under the age of 18 or are an adult at risk;*
 - *inappropriate intimate relationships between School staff and any undergraduate student;*
 - *intimate relationships between staff and students where there is direct supervision of the student by the member of staff.*
 - *Staff must always disclose a new or pre-existing close personal or intimate relationship with a registered student or another staff member*
 - *The School will review such disclosures with a view to ensuring no conflicts of interest and that student education and welfare is not compromised or at risk of being compromised*
 - *Failure to disclose by a member of staff will normally result in referral into staff disciplinary procedures and may result in disciplinary action*
- *Students are not required to disclose to the School close personal or intimate relationships with students or staff, although they may do so if they choose.*

Contents

1. Introduction.....	4
Allied Policies	4
2. Scope and Principles of this Policy.....	5
General conduct expectations for Rambert School Staff (including temporary, sessional or guest staff) regarding working relationships	5
General conduct expectations for Rambert School students regarding working relationships	6
Prohibited relationships	6
Conflicts of interest.....	6
Personal relationships and social media	7
3. Definitions	7
4. Relationships between staff and students	9
Pre-existing relationships	10
Pre-existing relationships: staff.....	11
Pre-existing relationships where an individual is applying to become a student at Rambert School	11
Staff involved in admissions processes.....	11
Cessation of a declared close personal or intimate relationship.....	11
Pre-existing relationships: students.....	12
Student relationships with external staff (e.g. on placements)	12
5. Relationships with students under the age of 18 and/or adults at risk ...	13
6. Relationships between staff members.....	13
7. Procedure for declaring close personal and/or intimate relationships ...	14
How to declare a close personal and/or intimate relationship	14
Declaration of close personal and/or intimate relationships by new contracted staff....	15
DECLARATION OF CLOSE PERSONAL AND/OR INTIMATE RELATIONSHIP PROCEDURE.....	15
□ STAGE 1 – Declaration	15
□ STAGE 2 – Determination of Conflict of Interest Management Measures	15
□ STAGE 3.....	16
Third party disclosures	16
Procedure for anonymous disclosures	17
8. Breaches of this Policy	18
9. Complaints	18
Complaints about the operation of these procedures	18
Third party complaints	18
10. Whistleblowing	19
11. Non-Disclosure Agreements	19

1. Introduction

- 1.1 This Policy sets out the requirements and expectations of Rambert School with regard to personal relationships between staff and students, and between colleagues.
- 1.2 Staff who work at Rambert School in any field of employment, whether in a fulltime or part-time, permanent, temporary or guest capacity, are in a position of authority and trust. Students of Rambert School, a number of whom are under 18 years of age, are in a position of relative vulnerability. By its very nature, dance itself, and the education and training of dance, requires the highest level of trust and professionalism from all those engaged in it, from academic and professional services staff to students and from guest artists to visiting choreographers. Rambert School is committed to creating and maintaining a safe and trusted professional working and learning environment for all participants.
- 1.3 We believe that all students and staff at Rambert School should be valued equally. This belief notwithstanding, Rambert School recognises that there is an unequal balance of power between staff who are in a position of authority, and students who are in the position of learner. This is especially important where there is a direct professional relationship between a staff member and a student. However, there can also easily be an imbalance of power between staff members who may hold different positions of authority within the School. For these reasons, this Policy therefore covers both staff and students.
- 1.4 This Policy is intended to provide clarity around personal relationships in the professional environment of Rambert School and its activities, to ensure the protection of our whole School community.

Allied Policies

- 1.5 Rambert School policies which are allied in particular to this Policy include:
- Safeguarding Policy, including Appendix 1 Safe Touch Policy
 - School Code of Behaviour & Student Code of Conduct
 - Staff Professional Code of Conduct
 - Policy on Sexual Misconduct, Harassment and Related Behaviours
 - (Student) Non-Academic Misconduct Policy and Procedure
 - (Staff) Disciplinary Policy
 - Behaviour Management & Acceptable Restraint Policy
 - Social Media Policy
 - Equality, Diversity and Inclusion Policy
 - Staff Grievance Policy
 - Student Complaints Procedure
 - Policy and Procedure on Public Interest Disclosure (Whistleblowing Policy)

2. Scope and Principles of this Policy

2.1 This Policy seeks to protect students and staff from allegations of actual or perceived conflicts of interest, and to make reasonable efforts to limit the circumstances in which a position of power might be abused. In working towards these endeavours, we seek to ensure a positive working environment with clear expectations for all members of our School community, where all are treated with kindness, fairness and respect.

2.2 There is potential for abuse, or the perception of abuse, in any intimate relationships between individuals in fundamentally unequal positions where one individual is expected to discharge their teaching, supervisory or pastoral responsibility for the other, whether or not they are paid for their services (including guest/invited individuals). At Rambert School, such positions include but are not limited to the following:

- Teaching staff of both undergraduate and postgraduate students
- Supervisory staff of both undergraduate and postgraduate students
- Academic Mentoring staff
- Pastoral Mentoring / Guidance staff
- Student Support Staff
- Other Professional Services Staff
- Guest Teachers/Visiting Faculty, paid/unpaid
- Guest Choreographers, paid/unpaid
- Additional staff (e.g. external individuals delivering training)

2.3 Due to the potential for conflict of interest, exploitation, favouritism or bias, such relationships may undermine the integrity of Rambert School's educational activities whether at undergraduate or postgraduate level. For those directly involved, they may have adverse effects on the working and learning environment, and broader institutional School culture, as well as for staff colleagues and student peers.

2.4 Relationships in which one individual is in the position of assessing and/or evaluating the work of a student, and/or where they may be in a position of influence over a student's future career, may also provide grounds for complaint by third parties when that relationship gives undue access or advantage, restricts or limits opportunities, or simply creates a perception of such behaviour.

General conduct expectations for Rambert School Staff (including temporary, sessional or guest staff) regarding working relationships

2.5 Rambert School recognises that the working relationships between staff and students are often close and interpersonal. It is essential therefore that staff always demonstrate exemplary behaviour and familiarise themselves with the School Code of Behaviour and Staff Professional Code of Conduct. Staff should always give due consideration as to what is an appropriate environment and what is appropriate conduct in relation to the activities they are undertaking, recognising that actions no matter how well-intentioned, may be misinterpreted if they fail to do so.

2.6 Staff are expected to maintain a professional boundary when dealing with students both in School 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. The development of unprofessional friendships/relationships will be deemed as gross misconduct and will be referred into the School's staff disciplinary procedures.

General conduct expectations for Rambert School students regarding working relationships

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

Prohibited relationships

2.8 Under this Policy, the following relationships are expressly prohibited by the School:

- 2.8.1 intimate relationships between School staff and students where students are under the age of 18 or are an adult at risk;
- 2.8.2 inappropriate intimate relationships between School staff and any undergraduate student;
- 2.8.3 intimate relationships between staff and students where there is direct supervision of the student by the member of staff.

2.9 Please also see Section 4 'Relationships between staff and students', and Section 5 'Relationships with students under the age of 18 and/or adults at risk'.

Conflicts of interest

2.10 To help the School avoid and manage conflicts of interest that may compromise, obstruct or prevent any of its activities, and to help it protect its staff and students, **all staff members are required to disclose the following:**

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

2.11 In the event that circumstances arise where a member of staff is in a relationship with an undergraduate student who is aged 18 years or older, the School's position with regard to the continued employment position of the member of staff (including consideration of changes to duties/contractual terms and conditions, possible breach of the Staff Professional Code of Conduct and, in cases of serious contractual breaches, termination of employment), will be reached under the Procedure for Declaration of Personal Relationships (see Section 7 of this Policy).

- 2.12 Where relationships do occur, the staff member will be temporarily removed from all responsibilities that may entail a perceived or actual conflict of interest and/or abuse of power.
- 2.13 Where staff are unsure as to whether they have a close personal or intimate relationship with another staff member or a student (either current or incoming new student), they should seek advice from their line manager or the Head of Administration. Staff are particularly encouraged to seek advice if the other party expressly does not wish for the relationship to be reported to the School. Staff have a responsibility to disclose whether they have a close personal or intimate relationship with another member of the School (whether staff or student), regardless of the wishes of the other party. Please see **Procedure for Declaration of Personal Relationships** (section 7 of this Policy) for further information.

Personal relationships and social media

- 2.14 The School's policy and expectations regarding personal relationships, as set out above and throughout this policy, extend to conduct on social media and online activities, as well as in person. The School may consider a personal relationship that falls within the scope of this policy to be in place even where it has been conducted solely online/via social media. Failure to declare such a relationship will normally be considered a breach of this policy.

3. Definitions

- 3.1 This section of the Policy contains some definitions relevant to the scope of this Policy. The School [Policy on Sexual Misconduct, Harassment and Related Behaviours](#) also contains definitions of unacceptable behaviours, some of which are referred to below, and is aligned with this Policy. Other relevant definitions can be found in the [School Safeguarding Policy](#). The School may refer to definitions in any of these policies when reviewing any matters that fall within the scope of this policy, the Policy on Sexual Misconduct, Harassment and Related Behaviours, or the Safeguarding Policy.

- 3.2 **Abuse of Power** – where someone uses their position of power or authority in an unacceptable way. 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;
- selective treatment that excludes others.

- 3.3 **Adult** – any person who has attained the age of 18.

- 3.4 **Adult at risk** – any person aged 18 years or over who is at risk of abuse or neglect because of their needs for care and/or support, and as a result of those needs is unable to protect themselves against significant harm or exploitation. This can be mental, psychological or physical wellbeing, or the potential to be drawn into activity or situations where they may be exploited.

3.5 Child – any person who has not attained the age of 18.

3.6 Close personal relationships – where there is a relationship with a relative, guardian, caregiver or close family/personal friend. Under this Policy, close personal relationships also include relationships where there is financial dependence.

3.7 Coercive behaviour – an act, or pattern of behaviour or actions used to harm, punish, frighten, intimidate or humiliate a person. Coercive behaviour can comprise more than one type of behaviour or actions.

3.8 Consent – Rambert School defines consent as ‘agreeing by choice and having the freedom and capacity to make that choice’. This can be considered in two stages:

- Whether the individual had the capacity (ie the age and understanding) to make a particular choice (e.g. to engage in sexual activity)
- Whether they were in a position to make that choice freely, and were not constrained in any way

The question of capacity to consent is particularly relevant when an individual is intoxicated by alcohol or affected by drugs. Consent can be withdrawn at any time.

3.9 Capacity to Consent – whether someone is physically and/or mentally able to make a choice and to understand the potential consequences of that choice. For example, a person cannot consent if they are asleep or unconscious, therefore they do not have the capacity to consent. The capacity to consent may be affected, inhibited or removed by the influence of drugs or alcohol, or by mental health conditions, or by cognitive or learning difficulties.

3.10 Consent to an intimate relationship – Consent is agreeing by choice and having the freedom and capacity to make that choice. The person seeking consent should always take steps to ensure that consent is freely given and informed. It is important to remember that even where consent is given, it may and can be withdrawn at any time.

3.11 Controlling behaviour – an act or pattern of acts intended to make a person subordinate or dependent. Examples of controlling behaviour include, but are not limited to, isolating someone from support (including friends and family), exerting control over their everyday choices and behaviour (such as controlling food/clothing choices). It can also extend to exploiting them for personal gain and/or depriving them of the resources they need to be independent.

3.12 Freedom to Consent – a person is free to make a choice if nothing negative would happen to them if they said no. For example, a person is not free to make a choice if:

- There is a significant power imbalance and the person without the power/with less power feels pressure to consent as a result;
- They believe that the continuation or assessment of their studies, or progression or advancement of their career, will or may be at risk if they refuse to consent;
- They are being threatened with violence by anyone;
- There is a threat of humiliation, whether explicit or implicit;
- They are being blackmailed.

- 3.13 **Grooming** – a process, which may be gradual, where someone in a position of power uses their authority/power to manipulate someone in a position of less/no power. Grooming can happen when there is a power differential within a relationship, which the abuser exploits for their own gratification. Grooming is most associated with child sexual abuse, but adults can also be groomed. The nature of grooming makes it difficult for the person being groomed to identify when abuse is happening, and more difficult to identify and talk about it in retrospect.
- 3.14 **Intimate relationships** – under this Policy, the School defines an intimate relationship is a consensual romantic/sexual relationship which goes beyond the bounds of a platonic or working relationship. An intimate relationship can last any amount of time, including one-off occurrences or brief isolated or recurrent periods.
- 3.15 **Position of Trust** – Any School staff member is in a position of trust. They are in a natural position of authority in their working relationship with students, whether undergraduate or postgraduate. In accordance with holding this position of trust, staff must ensure they follow the Staff Professional Code of Conduct, and the School Code of Behaviour.
- 3.16 **Power relationship** – this describes the balance of power between two individuals in a particular context. A power relationship can be equal or unequal, and can apply to different contexts (e.g. professional/intimate). For example, the professional power relationship between two members of staff who hold the same or a similar level of authority may be considered an equal power relationship; the professional power relationship between a member of staff and someone either more senior or more junior would be considered an unequal power relationship. A professional power relationship can impact on an intimate one, and vice-versa. The School will take power relationships into account in the event of staff to student sexual misconduct.
- 3.17 **Power differential** – this is used to describe the difference in power between individuals, where someone has a measure of power over another. For example, there is a power differential between someone who is older or physically stronger and someone younger or less physically strong; equally, there is a power differential between a teacher/other staff member and a student.
- 3.18 **Staff** – includes all permanent, temporary, freelance, guest and volunteer staff employed by the School, regardless of whether they are employed in an educational, artistic, pastoral or other capacity.
- 3.19 **Student** – includes all registered students of Rambert School at any educational level.

4. Relationships between staff and students

- 4.1 As members of Rambert School, staff hold positions of trust and responsibility regarding the academic studies, personal welfare, rights and needs of students. Staff must not engage in sexual or other inappropriate intimate relationships with someone with whom they are in a position of trust.

- 4.2 In accordance with [Rambert School's Staff Professional Code of Conduct](#), staff must treat students with dignity, building relationships rooted in mutual respect, and must at all times observe proper boundaries appropriate to their professional position. Staff are required to have due regard for the need to safeguard students' wellbeing. Fostering and/or entering into an inappropriate intimate relationship compromises a staff member's ability to abide by these professional obligations.
- 4.3 The School understands that intimate relationships are complex and that individuals of a wide variety of ages and experience can study in higher education. For this reason, the School does not place a 'blanket ban' on relationships between staff and students but does have very clear requirements and some particular prohibitions. The explicit and implicit power dynamics present in dance and dance education/training require Rambert School staff to exercise the highest degree of professionalism and integrity in their roles.
- 4.4 Rambert School prohibits members of staff from having intimate relationships with students where the staff member has a direct responsibility for, or involvement in, that student's academic studies and/or personal welfare, regardless of whether the student is at undergraduate or postgraduate level. Such relationships would be deemed by the School to be inappropriate intimate relationships.
- 4.5 Close personal relationships may also impact upon a staff member's role. Where there is no direct responsibility or involvement in a student's academic studies and/or personal welfare, and/or where there is a close personal relationship, the relationship should still be declared by the member of staff. Whilst they are not fully prohibited, the School will review such a relationship with a view to establishing any conflicts of interest and the terms of the staff member's role and/or employment may need to be adjusted in light of such a relationship. In exceptional cases, where a close personal relationship creates a conflict of interest that excessively compromises the staff role, the continued employment of the staff member may not be feasible.
- 4.6 **Staff members, regardless of whether they are new or continuing, permanent, temporary, freelance, volunteer or guest staff, are therefore required to declare to the School an intimate or close personal relationship** (see Section 3 'Definitions') they have with a student. Failure to do so will normally result in referral into staff disciplinary procedures (see Section 7 'Procedure for declaring close personal or intimate relationships: Failure to disclose' for further information).

Pre-existing relationships

- 4.7 The School understands that pre-existing relationships between students and staff (including guest teachers/choreographers/freelance staff employed to deliver training or professional development activities) may occur from time to time. Our approach to the consideration of these is to ensure that any conflicts of interest are managed appropriately and that the welfare and education of our students is not compromised. Where such a relationship exists, this may have a bearing on the recruitment and/or employment of the member of staff, in accordance with the principles set out in this Policy.

Pre-existing relationships: staff

- 4.8 Where a person becomes a staff member and they have a pre-existing close personal or intimate relationship with a current or incoming student, they will be required to declare this at the point of accepting an offer of employment (see Section 7 'Procedure for declaring close personal or intimate relationships').

Pre-existing relationships where an individual is applying to become a student at Rambert School

- 4.9 Staff are not required to disclose an existing close personal or intimate relationship with an individual who is applying to become a student at the School, until the point at which that student has accepted and had confirmed an offer of a place to study at the School. However, once an offer of a place on an undergraduate or postgraduate course of study has been confirmed by the School, the staff member will be expected to disclose the relationship to the School at their earliest convenience and in all circumstances before the student commences their studies with the School. For further information see Section 7 'Procedure for declaring close personal or intimate relationships'.

Staff involved in admissions processes

- 4.10 Notwithstanding the above, any member of staff who is involved in the admissions process, including auditions, must declare any conflict of interest they have in any stage of that process to the School as soon as they become aware of it. This includes pre-existing relationships with an applicant. Declarations should be made by notifying either the School Principal, the Head of Admissions, Registry & Student Support, or the Head of Administration. Staff who declare a conflict of interest may still participate in any stage of the admissions process, at the discretion of the School Principal, however they will not participate in any decision-making with regard to any application.
- 4.11 Unless the pre-existing relationship would have a material bearing on the role in question, no further action will be taken; the information will be held on the relevant file of the staff member in question as well as those of the student in the close personal or intimate relationship, and will be retained in accordance with the principles and requirements under the Data Protection Act (2018) and the General Data Protection Regulations (2018).
- 4.12 Where the pre-existing relationship would have a material bearing on the role in question, the School's Head of Administration, together with the Chief Executive, Principal & Artistic Director (or a nominated deputy in their absence) and any relevant staff as are reasonably required (e.g. Head of Admissions, Registry & Student Support) will review the matter and determine any necessary action, including whether the matter requires to be referred into staff disciplinary procedures. Please see Section 7 'Procedure for declaring close personal or intimate relationships' for further information in this regard.

Cessation of a declared close personal or intimate relationship

- 4.13 In the event of the cessation of the close personal or intimate relationship, the staff member has the responsibility of notifying the School so that records can be appropriately maintained and the School can provide relevant support to the student in question.

Pre-existing relationships: students

- 4.14 Where a person becomes a student and they have a pre-existing close personal or intimate relationship with a current staff member, it is the responsibility of the staff member to declare the relationship to the School (see Section 7 'Procedure for declaring close personal or intimate relationships'). Students will not be held responsible for failing to declare such relationships. The staff member, who is in a position of trust, will be held responsible and may face disciplinary action under the School's staff disciplinary procedures for failing to declare such a relationship. Please see Section 7 'Procedure for declaring close personal or intimate relationships' for further information in this regard.
- 4.15 Unless they are engaged to teach other students in the School, students are not obliged under any circumstances to disclose close personal or intimate relationships with other students to the School, whether they begin at the School with a pre-existing relationship with a current student, or whether they form new close personal or intimate relationships with another student whilst themselves a registered student of the School. Should they wish to, students are however welcome to disclose close personal or intimate relationships to the School, who will treat this information with the due confidentiality regarding personal data.
- 4.16 Where a student is engaged to teach other students in the School (eg where a postgraduate student is engaged to teach undergraduate students), they must declare any close personal or intimate relationships with other students in the same way as all staff.

Student relationships with external staff (e.g. on placements)

- 4.17 Rambert School students working with an external organisation, such as a placement provider, must abide by the policies and procedures of that organisation. In those circumstances, whilst the School views the status of registered students on placement as being students, an external organisation/placement provider may well regard students as having the same or similar obligations as staff members (e.g. a student on placement activity in a School delivering workshops is likely to be considered as similar to a staff member, rather than similar to a pupil). In the absence of a policy in the external organisation/placement provider, Rambert School students must follow this policy.
- 4.18 When on placement or working with any external organisation in the capacity of a student of Rambert School, all students (both undergraduate and postgraduate) have a responsibility as representatives of the School to behave professionally at all times. This includes adhering to any policies of the external organisation/placement provider regarding personal relationships.
- 4.19 **Rambert School students should not in any circumstances enter into close personal and intimate relationships with placement supervisors or any individuals who have a direct professional responsibility towards the student.** Doing so may compromise the student's education, the placement experience and/or opportunities of other Rambert students, the professional position of the external staff member, and the future relationship of the School with that organisation. The School may take action under the Non-Academic Misconduct Policy and Procedures for a breach of this policy if a student does enter into such close personal or intimate relationships.

5. Relationships with students under the age of 18 and/or adults at risk

5.1 The School understands that there may be occasions where there is a pre-existing close personal relationship between a staff member and a student of Rambert School who is under 18 years of age. In rare and exceptional circumstances, the School also acknowledges it is feasible that a new close personal relationship might develop.

5.2 **Close personal relationships between staff members and students under 18 years of age are not prohibited by the School.** For example, circumstances where a staff member who is a close relative, or family friend of a student under 18 years of age would fall into the category of close personal relationship. The relationship should always be declared by the staff member, and the School will always act to ensure there are no actual or perceived conflicts of interest. **However, intimate relationships** (as defined by the School in this Policy) **between staff and students under 18 years of age are expressly prohibited.**

5.3 Members of staff must not be in, or enter into, an intimate relationship with a student of Rambert School who is under the age of 18 and therefore legally a child, or who is an adult known to be at risk or who is suspected of being at risk.

5.4 Whilst a young person can consent to sexual activity once they are 16 years of age, the [Sexual Offences Act \(2003\)](#) makes it a criminal offence for an adult in a position of trust (see Section 3, 'Definitions') to engage in sexual activity of any kind with a person under the age of 18.

5.5 Any concerns regarding a member of staff acting inappropriately towards any student should contact the School Chief Executive, Principal & Artistic Director and/or the Head of Admissions, Registry & Student Support and – if the student is under 18 or an 'at risk' individual, the School Safeguarding Officer in the first instance, who will determine next steps, which may include:

- Contacting the PREVENT SPOC if any of the concerns fall within the scope of the PREVENT Duty;
- Contacting the Local Authority Designated Safeguarding Officer, in accordance with Safeguarding Protocols;
- Liaison with the School Chief Executive, Principal & Artistic Director and Head of Administration, as appropriate and necessary, to determine any necessary action, including possible referral into staff disciplinary procedures.

6. Relationships between staff members

6.1 Where a person becomes a staff member and they have a pre-existing close personal or intimate relationship with a current staff member, both the new staff member and the current staff member have a responsibility to ensure the relationship is declared. For the avoidance of doubt, the new staff member is required to declare this at the point of accepting an offer of employment (see Section 7 'Procedure for declaring close personal or intimate relationships'). Where both members of staff are incoming and new, both staff members are required to declare the relationship at the point of accepting an offer of employment.

6.2 Unless the pre-existing relationship would have a material bearing on the role in question, no further action will be taken; the information will be held on the relevant files of the staff member in question as well as those of the other person in the close personal or intimate relationship, and will be retained in accordance with the principles and requirements under the Data Protection Act (2018) and the General Data Protection Regulations (2018).

6.3 Where the pre-existing relationship would have a material bearing on the role in question, the School's Head of Administration, together with the Chief Executive, Principal & Artistic Director (or a nominated deputy in their absence) and any relevant staff as are reasonably required (e.g. Head of Admissions, Registry & Student Support) will review the matter and determine any necessary action. Please see Section 7 'Procedure for declaring close personal or intimate relationships' for further information in this regard.

7. Procedure for declaring close personal and/or intimate relationships

7.1 In the event that the Head of Administration is not available to carry out any of their functions in relation to **the procedures under this Policy**, a member of staff nominated by the Chief Executive, Principal & Artistic Director may be delegated to carry these out.

7.2 **A summary of the types of close personal and/or intimate relationships that should be declared by staff is provided below:**

- Close personal and/or intimate relationship between a **new staff¹ member and an existing staff member**
- Close personal and/or intimate relationship between **two new staff members**
- Close personal and/or intimate relationship between **two current staff members**
- Close personal and/or intimate relationship between a **new staff member and a current student**
- Close personal and/or intimate relationship between a **new or current staff member and a new student** (See Section 4 'Relationships between staff and students: *Pre-existing relationships where an individual is applying to become a student at Rambert School*'))

7.3 The School expects that most relationships that are declared will not be a breach of this Policy (see Section 8 'Breaches of this Policy') and will be able to be managed via **Conflict of Interest Management Measures** (see STAGE 2 '*Declaration of close personal and/or intimate relationship procedure*'). The School is committed to working with staff in a transparent and understanding way, and any measures taken in accordance with this procedure will be determined

How to declare a close personal and/or intimate relationship

7.4 All staff members, whether new or current, are required to declare a close personal and/or intimate relationship. Staff members who need to declare a close personal and/or intimate relationship as outlined above should complete a **Personal Relationships**

¹ 'Staff' includes all permanent, temporary, freelance, guest and volunteer staff employed by the School, regardless of whether they are employed in an educational, artistic or other capacity.

Information Form (Appendix 1 to this Policy) and submit it to the School's Head of Administration.

Declaration of close personal and/or intimate relationships by new contracted staff

7.5 New staff commencing a contract of employment with the School will be asked at the point of confirming their contract with the School to complete a Personal Relationships Information Form (Appendix 1 to this Policy) which will ask staff to declare any close personal and/or intimate relationship with another staff member and/or current or incoming student.

DECLARATION OF CLOSE PERSONAL AND/OR INTIMATE RELATIONSHIP PROCEDURE

7.6 Where a relationship is declared, the following procedure will be followed:

- ***STAGE 1 – Declaration***

7.6.1 The staff member completes a **Personal Relationships Information Form (Appendix 1 to this Policy)** and submits it to the School's Head of Administration.

- ***STAGE 2 – Determination of Conflict of Interest Management Measures***

7.6.2 The Head of Administration will review the form and will determine whether there is a need to discuss the details with the staff member(s), or with the Line Manager in the first instance, as deemed necessary and appropriate by the Head of Administration.

7.6.3 The Head of Administration, the Head of Admissions, Registry & Student Support and another member of Senior Staff (e.g. the Academic Registrar & Head of Compliance, Deputy Principal or Chief Operating Officer) will determine the following:

- Whether there are any actual conflicts of interest;
- Whether there may reasonably be any perceived conflicts of interest;
- Whether there are any concerns relating to PREVENT;
- Whether there are any Safeguarding concerns;
- What action (if any) may be needed to remove any actual or potential conflict

In determining the above, the following factors may be taken into consideration:

- Any known vulnerability of the student or staff member(s);
- The personal circumstances of the student or staff member(s) at the time;
- Whether there is, or is going to be, a teaching or supervision arrangement in place, and the implications of this (including where one staff member is more senior than the other, in cases involving two staff members);
- The circumstances of the student or staff member(s) when the close personal relationship or intimate relationship commenced, or was initiated (e.g. if the relationship existed prior to both parties' relationship with Rambert School);
- Any special close relationship (e.g. family/guardianship);

- The nature of the two individuals' contact in study or other academic activities, or employment
- Any potential for a staff member to impact upon or influence the academic progress and outcomes or career progression of the student/other staff member;
- The extent of the power imbalance between the two individuals.

- **STAGE 3**

7.6.4 Once this decision has been reached:

- **where no actions are required:**
 - the Head of Administration will complete and sign off the Personal Relationships Form. Copies will be provided to the relevant staff members.
- **Where any action is required:**
 - If there are any Safeguarding Concerns, the School Safeguarding Officer will be consulted and direct specific action may be taken (e.g. reporting to the Local Authority Designated Safeguarding Officer);
 - The Head of Administration will meet with the staff member(s) and the Line Manager(s) to discuss, inform and consult on what actions, if any, are required to remove any potential conflict. Wherever possible, the School will seek to agree actions collegially with staff, but as the employer, the final decision about what actions are necessary rests with the School;
 - The actions will be documented on the Personal Relationships Form and copies will be provided to the relevant parties;
 - The Personal Relationships Form will be stored securely on the member(s) of staff's central HR file.
 - Where the relationship involves a student, the student will be notified by the School that the relationship has been declared.

7.6.5 Where agreement about any actions cannot be reached, or where there is any other unresolved issue, the matter will be escalated to the Chief Executive, Principal & Artistic Director, who will review the case and make the final decision on action.

Third party disclosures

7.7 Where a third party (whether a student, a staff member or another individual external to the School) discloses a close personal or intimate relationship to the School that falls within the scope of this Policy for relationships that should be declared to the School, the School will normally record the matter via the Stage 1 Procedures under the School's Policy on Sexual Misconduct, Harassment and Related Behaviours in the first instance. An Early Investigation will take place to determine what action (if any), may need to be taken, referring the matter as necessary to the Head of Administration. The School will seek to verify the claim and if established, the Head of Administration will verify whether the relationship has already been declared. Where the relationship has been established but has not been declared, the procedure set out in the section 'Failure to Disclose' will be followed (see further on in this section).

- 7.8 The same process may be followed where a student discloses a relationship with a staff member to the School.

Procedure for anonymous disclosures

- 7.9 In the event that the School receives an anonymous disclosure from a third party about a close personal and/or intimate relationship between a staff member (see Section 3 'definitions') and another staff member or a student, the School will follow the following procedure:
- 7.9.1 The disclosure will be forwarded to the Head of Administration (or in the event they are not available, the Chief Executive, Principal & Artistic Director will nominate an alternative member of staff to receive this²);
- 7.9.2 The Head of Administration will review the disclosure and will review what information the School already holds in relation to this matter;
- 7.9.3 Where the School already holds the information disclosed, the School has an obligation to notify the staff member(s) concerned that someone contacted the School anonymously in this regard. The Head of Administration will notify the staff member concerned (or both staff members in the event it concerns two staff members of the School) that the disclosure has been made but that no further action is being taken nor is necessary and the School considers this the end of the matter;
- 7.9.4 Where the School does not already hold this information, the Head of Administration will notify the staff member concerned (or both staff members in the event it concerns two staff members of the School) that the disclosure has been made, and will invite the staff member(s) to an informal information-gathering meeting to verify the information received. A notetaker will normally be present. This is an informal meeting, likely to be fairly brief, and is not part of any formal HR procedures. Nonetheless, the staff member(s) may be accompanied to this informal meeting by another member of staff, a friend or a family member, should they wish;
- 7.9.5 Following the meeting, the Head of Administration will ascertain the following:
- whether or not a disclosure should reasonably have been made by the staff member(s);
 - if so, when the close personal and/or intimate relationship should reasonably have been disclosed, in accordance with the principles of this Policy;
 - whether or not the relationship has a bearing on the staff member(s)' professional obligations and functions of their role;
 - whether there is a need for any further action, and a recommendation for what this should be. This will be guided by whether or not the relationship has any bearing on the staff member(s)' professional obligations and functions of their role.

² Where a nominee is appointed, they will support the Principal in following this procedure, issuing communications with the agreement of, and on behalf of, the Principal. They are not expected to fulfil the role or responsibilities of an HR manager. Communications issued by a nominee should clearly indicate they are being issued on behalf of the Principal.

7.10 Where a need for any further action is identified, the matter will then be referred into STAGE 3 of the 'Declaration of close personal and/or intimate relationship procedure' and that process will be followed.

8. Breaches of this Policy

8.1 The following are breaches of this policy:

- Failure by a member of staff to declare a close personal and/or intimate relationship with a current or incoming³ student of any age or level of study;
- An intimate relationship with a student under 18 years of age;
- Failure to declare a close personal and/or intimate relationship with a new or current staff⁴ member.

9. Complaints

9.1 Where a student or staff member makes a complaint about an inappropriate close personal and/or intimate relationship involving them personally as the other party in the personal relationship, this will normally be handled in the first instance via Stage 1 of the Procedures under the Policy on Sexual Misconduct, Harassment and Related Behaviours, to gather information and ensure a flexible and supportive approach. The Early Investigation Officer may refer the complaint as necessary to the Head of Administration (or a nominee with authority delegated by the Chief Executive, Principal & Artistic Director) for consideration under this Policy.

9.2 Students may also raise concerns via Stage 1 or Stage 2 of the [Student Complaints Procedure](#), should they choose. A Completion of Procedures Letter may be issued, in the event that the School's internal procedures are exhausted.

9.3 Staff may also raise concerns informally to the Head of Administration, or to their Line Manager who will normally refer such concerns to the Head of Administration or to the Chief Executive, Principal & Artistic Director. Stage 1 of the Procedures under the Policy on Sexual Misconduct, Harassment and Related Behaviours will normally be followed, although an alternative process may be followed if deemed appropriate by either the Head of Administration or the Chief Executive, Principal & Artistic Director.

Complaints about the operation of these procedures

9.4 Where a student wishes to complain about matters relating to the operation of these procedures, they may do so via Stage 1 or Stage 2 of the Student Complaints Procedure.

9.5 Where a staff member wishes to complain about matters relating to the operation of these procedures, they may follow the procedures set out in the Staff Grievance Policy.

Third party complaints

9.6 Where a third party makes a complaint or raises a concern, please see 'Third Party Disclosures' in section 7 of this Policy.

³ See Section 4 'Relationships between staff and students: *Pre-existing relationships where an individual is applying to become a student at Rambert School*'

⁴ See Section 3 'Definitions: Staff'

10. Whistleblowing

- 10.1 The Public Interest Disclosure Act applies to employees, trainee staff, agency staff and contractors. Although not protected by the Act, other members of the Rambert School community, such as students, members of the Board of Trustees and guest/visiting faculty, may make a disclosure to the School regarding a possible breach of this policy which will be treated in accordance with the School's Policy and Procedure on Public Interest Disclosure (Whistleblowing Policy). See also 'Third Party Disclosures' in Section 7 of this Policy.

11. Non-Disclosure Agreements

- 11.1 Rambert School has a zero-tolerance policy on sexual misconduct, harassment and related behaviours. The School undertakes to provide a safe environment for all students and staff. We take allegations of possible breaches of this policy and any allied policies very seriously and we are committed to transparency.
- 11.2 To this end, Rambert School does not use non-disclosure agreements (NDAs) or confidentiality clauses in settlement agreements in cases of sexual misconduct and harassment to prevent reporting parties from speaking out or to restrict what the institution may disclose to others. We may, on occasion, place temporary 'no contact' conditions upon parties to protect all individuals whilst investigations are ongoing.