



POLICY 079 STAFF AND STUDENT RELATIONSHIPS

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Policy 079: STAFF AND STUDENT RELATIONSHIPS

1. PURPOSE

1.1 The Office for Students (OfS) is the regulator for higher education in England. General ongoing condition of registration E6 was introduced by the OfS on 1st August 2025 and covers subject matter relating to incidents of harassment and/or sexual misconduct which affects one or more students, including the conduct of staff towards students, and/or the conduct of students towards students. Providers must maintain a single comprehensive source of information ([SCSI](#)) which sets out policies and procedures on subject matter relating to incidents of harassment and sexual misconduct, including intimate personal relationships between relevant staff members and students. This Policy and Procedure forms part of ACM's response to condition E6.

1.2 This Policy aims to safeguard students and staff from:

- Conflicts of interest (actual or potential)
- Perceived conflicts of interest
- Intentional abuse of power
- Unintentional abuse of power
- Misconduct
- Alleged misconduct

1.3 This Policy forms part of ACM's single comprehensive source of information ([SCSI](#)), which brings together information for current and prospective students and staff about how the ACM prevents and responds to harassment and sexual misconduct. It includes clear information about the ACM's policies, how to get support, how to raise concerns, and what to expect from the processes followed by the company.

1.4 Staff should familiarise themselves with the [SCSI](#) so they can help signpost students to appropriate support and resources and understand their responsibilities in creating and maintaining an inclusive community, where students, staff and other persons are able to report behaviour that may amount to harassment and/or sexual misconduct and know this will be taken seriously.

1.5 This policy does not cover:

- Staff relationships with other staff
- Sexual harassment

1.6 Failure to comply with the company's Staff and Student relationships policy may result in disciplinary action.

2. SCOPE

2.1 This Policy applies to all permanent, fixed term employees, variable hours workers and casual workers (unless otherwise stated within the document) except for student workers. It also applies to all those working on a self-employed basis or through a temporary contract with a recruitment agency.

2.2 This Policy supersedes all other guidelines previously issued. This Policy and related

Procedure are not contractual and do not form part of the contract of employment.

2.3 This Policy does not apply to students. Their attention, however, is drawn to this Policy and the terms and requirements placed on members of staff as defined above. In particular, students' attention is drawn to Section 9 (9.3), Section 11 and Section 12.

2.4 The company's policies and associated documents help set out guidelines for conduct and behaviour within the working environment. There is an implied culture of two-way trust and confidence within the organisation, which governs the way in which we do things and enables colleagues to come to work with clarity regarding their priorities and decision making.

2.5 Other Policies to be read by staff in conjunction with the Disciplinary Procedure:

- Investigation and Disciplinary Policy and Procedure
- Staff Code of Conduct
- Sexual Harassment Policy and Procedure
- Safeguarding Policy and Procedure

3. AIMS

3.1 This policy and procedure aim to:

- Set out clear expectations as to staff relationships with students
- Act as part of ACM's [SCSI](#)
- Safeguard students and staff from acts of misconduct, abuse of power and conflicts of interest or allegations of these natures

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5. DEFINITIONS

Abuse of Power

5.1 Abuse of power is where a position of power or authority is used in an unacceptable manner. This can take various forms and may include, but is not limited to, grooming, manipulation, coercion and pressurising others to engage in conduct they do not feel comfortable with.

Close Personal Relationships

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

Cooling Off Period

5.3 The Cooling Off Period, refers to the 12 month period after a student completes their course with ACM.

Grooming

5.4 A deliberate process by which someone builds a relationship, trust, and emotional connection with a child, young person, or adult at risk, in order to manipulate, exploit or abuse them.

Heads of Education

5.5 Members of Senior Management and Heads of Department that oversee the Education delivery and development, including but not limited to Academic Registrar, Executive Dean of Education, Principal of FE, Dean of Academic Practice and Quality Manager.

Intimate Relationship

5.6 Intimate relationship means a consensual relationship that involves one or more of the following elements:

- (a) Physical intimacy including isolated or repeated sexual activity;
- (b) Romantic or emotional intimacy, which may be conducted in person and/or online and/or via electronic or any other form of communication;
- (c) This includes brief relationships and one-off occurrences, through to marriage or life partnerships, regardless of gender, gender identity or sexual orientation.

Member of Staff

5.7 Any person completing work for ACM. Including those on working on a permanent, fixed term, variable hours or casual worker contract, irrelevant of department within the business.

5.8 For the purpose of this policy, member of staff also applies to those self-employed or working through a recruitment agency.

Relevant Staff

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

Responsibility for a Student

5.10 Responsibility for a student is defined widely and includes any teaching, professional, pastoral or administrative responsibility or authority over a student, whether temporary or permanent, whether formally conferred on or voluntarily assumed by the staff member and whether the responsibility arises as part of the student's involvement with ACM. This includes but is not limited to lecturing, teaching classes, overseeing projects or events, mentoring, and setting and/or marking of examinations or other assessments of any type.

Sexual Misconduct

5.11 Any unwanted or attempted unwanted behaviour of a sexual nature. More information can be found within ACM Sexual Harassment Policy and Procedure.

Student

5.12 Any person currently studying any course or qualification at ACM either onsite or virtually, or on any course arranged by ACM. This includes visiting students, applicants, and offer-holders. It covers those completing work experience or work placements. It covers all students who are registered for a course even if their status is suspended but does not include former students who have finished their courses, unless they are current applicants or offer holders for another ACM course.

Vulnerable Adult

5.13 A vulnerable adult (also referred to as an Adult at Risk) refers to a person aged 18 or over who:

- Has care and support needs
- Is experiencing or at risk of abuse or neglect
- As a result of support or care needs is unable to protect themselves

6. ROLES AND RESPONSIBILITIES**6.1 All Workers:**

- To abide by the company's policies and procedures
- To support their fellow members of staff and students where possible
- To direct students to the [SCSI](#)
- To not withhold information

6.2 The Line Manager:

- To ensure their team members understand and are working in line with the company's policies and procedures
- To ensure matters of concern are disclosed correctly and to act with appropriate confidentiality

6.3 HR Department:

- Provide advice to line managers and members of staff in relation to the company policies and procedures.
- To ensure the policy and procedure are reviewed periodically, or in line with employment law updates or changes in OfS guidance.
- To support Heads of Education in their management of any disclosures made.

6.4 Heads of Education:

- To support the review of this policy periodically, or in line with employment law updates or changes in OfS guidance.
- To ensure that up-to-date records of declarations and conflicts of interests are maintained; and for determining and recording how to manage each.

7. PROHIBITION AND DISCLOSURES OF RELATIONSHIPS**7.1 From 1st September 2025:**

- (a) Relevant staff members are prohibited from pursuing or entering into an intimate relationship with any current student or with any student during the cooling off period. Failure to comply with this Policy will be considered as a disciplinary matter.
- (b) Relevant staff members are strongly discouraged from having any close personal relationship with any current student or with any student during the cooling off period and must declare to the Executive Dean of Education if such a relationship has developed, is developing or appears likely to develop between them and any student. A failure to declare will be considered as a disciplinary matter.

7.2 From 1st September 2025, Relevant staff members must not take on or assume a professional responsibility for a student:

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

7.3 If on 1st September 2025, a Relevant staff member is already in an intimate or any close personal relationship with any student or has previously been in an intimate or any close personal relationship with any student, they should declare that relationship to the Executive Dean of Education immediately, even if the relevant responsibility for the student has ended.

7.4 If a member of staff is in an intimate or any close personal relationship with a student for whom they do not currently have any direct or indirect academic responsibilities, or other direct professional responsibilities, but where the student and member of staff are both engaged with ACM; the relationship should be disclosed to the Executive Dean of Education so they may assess the risk of any conflict of interest and put appropriate alternative and/or protective measures in place as necessary.

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

7.6 Disclosure should be made by way of email to the Executive Dean of Education and include the following information:

- Staff member's name
- Staff member's job title
- Staff member's line manager
- Student name
- Student's ID number (if known)
- Student course (if known)
- Nature of the relationship
- When the relationship began (approx.)
- Any other information the staff member feels is relevant

8. CLOSE PERSONAL RELATIONSHIPS

8.1. Close personal relationships are strongly discouraged and must be disclosed under paragraph 7.3 of this Policy. However, ACM recognises that the nature of the industry means it may be appropriate for staff and students for whom they have responsibility to jointly participate in informal, social activities or events, providing careful consideration is given to potential conflicts of interest, professional norms and boundaries, and to how any such behaviour might be perceived. For any queries or concerns as to whether an event or social activity could form risk, please contact the Executive Dean of Education.

8.2 This policy cannot be explicit as to every area which may be considered a risk but it is generally recognised that a situation may be considered a risk:

- where a student is dependent on the member of staff in some way, which could be emotionally, practically or financially;
- where the situation could be considered, or could lead to accusations of, favouritism.
- Staff must be mindful of professional boundaries in all relationships with students and must act in a way which safeguards student welfare and ensures standards of academic integrity are upheld.

8.3 Even where a staff member does not have and is not likely to have responsibility for a student, staff should be very aware of and consider the potential for an actual or perceived imbalance of power or authority, accusations of bias or exploitation. The risks of such are likely to be heightened where there is a significant age difference between the staff member and the student; where the student is an undergraduate; and/or where the student is more vulnerable for any reason.

9. RELATIONSHIPS WITH STUDENTS WHO ARE UNDER 18 OR ARE VULNERABLE ADULTS

9.1 Members of staff who have responsibility for any students must never enter into an intimate relationship with a student or any other person under eighteen years of age or with a student who is an adult at risk, irrespective of whether the member of staff has any responsibility for the student or other person.

9.2 Staff are reminded that intimate relationships involving students (including applicants or offer-holders) under the age of eighteen where the staff member is in a position of trust or where the student is a vulnerable adult could fall within the scope of the Sexual Offences Act 2003.

9.3 Any person (staff, student or external) with any concerns as to an inappropriate relationship between an ACM member of staff and a student under the age of 18 or a vulnerable adult should raise their concerns to the safeguarding team via dsl_inbox@acm.ac.uk and consult [ACM's Safeguarding Policy](#) and [Procedure](#).

10. ADMISSIONS AND STUDENT RECRUITMENT

10.1 If an intimate or close personal relationship is pre-existing between any member of staff who has a role in selection of candidates for admission to ACM and a candidate

seeking admission, that member of staff must inform the Executive Dean of Education at the outset of the admissions exercise so steps can be taken to avoid any conflict of interest. The matter will, as far as possible, be handled in a way that respects confidentiality to ensure there is no detriment to the candidate.

11. NON-CONSENSUAL RELATIONSHIPS AND BEHAVIOURS

11.1 If a student experiences inappropriate behaviour in breach of this Policy, is involved in a relationship that they do not consider to be consensual, or if they consider that they have been adversely affected by a misuse of power, authority, or conflict of interest, they should make a report to the Executive Dean of Education or raise a complaint through the Student Complaints procedure.

11.2 Students who need additional support or advice should contact ACM's safeguarding team (dsl_inbox@acm.ac.uk) or ACM's wellbeing team (wellbeing@acm.ac.uk)

11.3 Staff who believe they have experienced inappropriate sexual behaviours from a student should follow ACM's staff Sexual Harassment policy.

12. ADVICE FOR STUDENTS

12.1 Members of staff should be able to direct students as to the terms of this policy and the responsibilities it places on staff. This policy will also be made available for students to view at www.acm.ac.uk/policies/

12.2 All members of staff should be able to direct students to the [SCSI](#) as required.

12.3 All staff should be aware of and be able to direct students to the [Student Conduct and Discipline Policy](#)

12.4 If an intimate or close personal relationship has developed contrary to this Policy, even if it predates the 1st September 2025, and/or the student is not sure that the member of staff has disclosed it, the student is encouraged to advise their Executive Dean of Education or any of the other Heads of Education whom they feel able to approach. However, there will be no disciplinary consequences for the student if they do not do so. The member of staff to whom the disclosure was made will be responsible for reporting the matter to the Executive Dean of Education.

12.5 Staff should be able to direct students to ACM's Safeguarding Policy via www.acm.ac.uk/policies/

12.6 Students should pay attention to the Non-Consensual Relationships and Behaviour section of this policy (Section 11) and should be aware of the support services available through ACM and listed in paragraph 11.2

12.7 Inappropriate behaviour by a student towards a member of staff or another student that amounts to sexual misconduct, physical misconduct or abusive behaviour, or otherwise breaches ACM's student guidelines on behaviour, may lead to action being taken under the [Student Conduct and Discipline Policy](#).

13. FURTHER CONTACTS AND EXTERNAL SUPPORT

13.1 ACAS

- ACAS can provide further information for members of staff relating to your rights in the workplace. For the ACAS helpline call 0300 123 1100

13.2 Police (UK)

- If you or someone you know are in immediate danger, call 999
- If you wish to make a non-urgent report, call 101

14. REVIEW AND OWNERSHIP OF THIS POLICY

14.1 This policy is owned and reviewed by the HR Department.

14.2 This policy will be reviewed by the HR Department in conjunction with the Senior Management Team on an annual basis. If there are changes in law or OfS guidance which affect this policy prior to the review date, modification may be made sooner.

14.3 If you have a concern that this policy is not being followed, you should report this at the earliest possible time to the HR Manager (hrrequests@acm.ac.uk) or the COO.

14.4 This policy will be widely promoted via the company's intranet, HR Self- Service System, onboarding processes and held within the company's offices.

14.5 If you have any questions surrounding this Policy, these should be raised to a member of the HR Department via hrrequests@acm.ac.uk

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