



Azure College Code of Professional Conduct: Policy on Staff and Student Personal Relationships (October 2025)

In reading this Policy, please refer to scope and definitions in section 3 and section 10.

1. Aims of the Policy

- 1.1 The purpose of this policy is to promote a safe, active community across the Azure Charitable Foundation ('the Foundation') where interactions between staff and students are a positive aspect of life at the Foundation, for all its members, by clarifying our expectations regarding professional behaviour and respectful boundaries for staff and students.

2. Policy statement

- 2.1 The Foundation has legal, regulatory and ethical responsibility to provide a high quality, supportive, inclusive, safe learning, working and supportive environment for our community. This commitment will enable staff and students to fulfil their personal potential. To enable this, the Foundation expects staff to apply the highest standards of professionalism in all interactions with students and to recognise this is a shared expectation across the Foundation in all services and constituent businesses.
- 2.2 It is important to acknowledge that the inherent nature of staff and student roles means that staff are in a position of power relative to students, irrespective of the student's age, maturity, level of study or support needs. Therefore, staff must always act in a professional, respectful and fair manner, recognising this differential of power and influence.



The power imbalance between staff and students creates the potential for sexual misconduct to occur between staff and students.

Consequently, **intimate personal relationships between staff and students are, and will always be, unacceptable.**

- 2.3 Personal relationships with students under the age of 18 or vulnerable adults are strictly forbidden and may constitute gross misconduct. Any violations will be dealt with via the disciplinary and child protection policies and the requirements of the Safeguarding Vulnerable Groups Act 2006
- 2.4 Under the Sexual Offences Act (2003) it is a criminal offence to enter into sexual activity with a person under the age of 18 where the adult is in a position of trust. **All Foundation staff are in a position of trust.** Please refer to the [Sexual Misconduct Policy and Procedure](#).

3. Scope

- 3.1 This policy covers **all staff and students** of the Azure Charitable Foundation. For the purpose of this policy:
- 3.1.1 a **member of staff** means anyone employed by the Foundation, working as a temporary worker, individuals working under a contract for services or as self-employed; and
with appropriate modifications, where necessary, to other individuals not employed by the Foundation who are acting for the Foundation to provide education or care services for students or clients and those who are involved in making decisions on a student's or client's selection, student's education, assessment or progression or a client's care.
- 3.1.2 a **student** means
- 3.1.2.1 any person (under 18 years of age or adult suspected to be vulnerable/at risk) in education or training at the



Foundation whether full time or part time, regardless of whether they study on campus, off campus or online. It includes deferred students, interrupted students and visiting students.

3.1.2.2 any person who was in receipt of education and training at or from the Foundation in the last five years when they were under 18 years of age or were considered to be an adult suspected to be vulnerable/at risk. For the avoidance of doubt, whereas a staff member and/or former student may represent that a relationship did not begin until the student left one of Azure's education or training programmes, it will always be assumed that this is/was not the case where a relationship is discovered within five years of the student's last year of education as defined and measured from the end date of the last academic year in which they were enrolled.

- Section 6.1 below covers individuals who are both members of staff and students.

3.2 Relationships

For the purpose of this policy there are two types of relationship. They are collectively referred to as **personal relationships**:

- an **intimate personal relationship** - including marital, life partner, physical, sexual (either isolated or repeated), emotional and romantic, regardless of gender, gender identity or sexual orientation, and which is consensual.
- a **close personal relationship** - a close personal relationship is with a relative, close family friend, close friend or a relationship where there is financial dependence.



4. Responsibilities of Azure Charitable Foundation staff

- 4.1 It is important that staff recognise that they are in a position of trust, and that it is their professional and ethical responsibility not to abuse that trust. Our staff are trusted to teach, care, guide and support students respectively and to recognise and maintain professional boundaries, in order to provide students with a high quality supportive and safe environment, to avoid abuse of trust through the imbalance of power and influence, and to avoid perceived or actual conflicts of interest.
- 4.2 It is important to note that reference to emotional intimacy should not prevent a member of staff engaging compassionately and considerately with a student on a professional basis.
- 4.3 It is important to recognise that different lived experiences and backgrounds may cause a difference in approach to professional boundaries and relationships, so it is key that the responsibilities in this policy are understood.
- 4.4 It is recognised that staff members with responsibility for students should recognise the particular imbalance of power in these relationships and the intersectional vulnerabilities this creates for students.
- 4.5 Consequently, subject to the exceptions below, members of staff:
 - must not pursue or enter into an intimate personal relationship with a student or purchase transactional sex from any student. Intimate personal relationships can lead to perceived or actual conflicts of interest, which can have a detrimental effect on the teaching, learning and/or care environment for students.
 - should contribute to creating a professional working environment where the development of an intimate personal relationship with a student is unacceptable.



- must ensure interactions with students are always professional and appropriate, avoiding conduct towards students that are unprofessional, inappropriate or in any way sexualised.
- must maintain professional relationships with students based on trust, confidence and equal treatment of all students.
- should not (where possible) enter into a close personal relationship (see section 3.2) with a student for whom they have a professional responsibility – for example in the areas of teaching/learning, assessment, selection or guidance/pastoral support. Close personal relationships can lead to perceived or actual conflicts of interest, which can have a detrimental effect on the teaching, learning and/or care environment for students and, more generally, colleagues.
- must not promise or allude to rewards in return for sexual favours or suggest or threaten the withdrawal of services or other forms of support from the Charity if sexual access is not granted. Such behaviour constitutes misconduct and will be subject to disciplinary proceedings.

4.6 This policy covers all areas of the Foundation. Any intimate personal relationship between a member of staff and a student raises questions about consent, the imbalance of authority and influence, conflict of interest, trust and/or confidentiality which may occur at the outset, during, or on the termination of a relationship. Such conflicts, as outlined above may arise in relation to the following areas (this list is not exhaustive):

- supervising and/or providing services to students
- deployment of financial and other resources
- all aspects of teaching and learning (including assessment and selection) and the provision of other services including extra-curricular activities
- access to confidential information



- access to education, support and the Foundation’s broader services (e.g. Employment Services) including financial assistance, accommodation and other services
 - matters including employment, career opportunities, housing opportunities, placements, complaints and discipline
 - assignment of paid work and facilities to students
 - pastoral care
 - indirect influence on other staff or students
- 4.7 Professional boundaries should be the norm for all staff on and off our premises and at all times and irrespective of any ‘occasion’.
- 4.8 Members of staff are strictly prohibited from inviting students into their homes.
- 4.9 Staff are discouraged from engaging students to work in their home, for example dog walking, child minding, babysitting, etc.
- 4.10 Social media has provided a platform for staff to share, collaborate and network globally. These additional dimensions can be a real benefit. However, the use of social media can blur professional boundaries and so staff should conduct themselves with common sense and act with professionalism and integrity in their interactions with students. For more information please see the [social media policy](#) for employees and the [social media guidelines](#).
- 4.11 Staff are expected to communicate with students via Azure Charitable Foundation accounts linked to their role, for example Foundation email addresses, telephone numbers, and Teams/Zoom. We recognise that there may be times, for example during excursions, where this is not possible. We recognise this and expect staff to follow the [GDPR regulations](#) and conduct themselves with common sense and act with professionalism and integrity.



4.12 Relationships which are coerced, coercive, exploitative or sexualised are always unacceptable and must not occur.

5. Responsibilities of Students

- 5.1 Students should not exert sexual pressure over a member of staff or behave in a coercive or predatory manner towards a member of staff. This type of behaviour will be subject to the Foundation's broader terms of business, policies and procedures.
- 5.2 Students can report and seek support for [harassment or sexual misconduct](#) that occurs within a relationship regardless of whether the relationship is permitted under this policy.

6. Exceptions and Declarations

6.1 The Foundation recognises that an individual whose primary relationship with the Foundation is or has been as a student may also be employed by the Foundation in a variety of roles (e.g. teaching assistant, garden centre, café, landscapes employee, etc). These individuals must not have an intimate personal relationship with students for whom they have direct academic (teaching/training) or other management or professional responsibility since the same issues of power, influence and consent are present in these situations.

The Foundation also recognises that an individual whose primary relationship with the Foundation is as an employee may also be a student of the Foundation. A member of staff who is also a student is deemed to be a member of staff for the purposes of this policy.

- 6.2 The requirements of paragraph 6.3 below should be followed in the following circumstances where:
- a close personal relationship between a member of staff and a student existed prior to one of the partners becoming a member of



staff or becoming a student at the Foundation where the staff member has a direct academic or other management or professional responsibility for the student.

- a close personal relationship where the staff member has a direct academic or other management or professional responsibility for the student.
- a member of staff may be involved in selection/acceptance of a prospective student with whom they have an intimate personal relationship or a close personal relationship.

6.3 It is the responsibility of the member of staff to declare their relationship to the Foundation at the earliest opportunity (following procedures notified by the Foundation) so that an assessment can be made of any potential conflict of interest and influence. We recognise that this information is confidential, sensitive information and it will be shared with the Head of Department (Director)/Line Manager, the CFO, COO and CEO unless a conflict of interest and influence plan requires notification to any other person(s). The details of any action needed will be recorded in a conflict of interest and influence plan.

6.4 An intimate personal relationship which existed before both partners became employees of the Foundation should be declared at the earliest opportunity and no later than one month of both partners becoming employees of the Foundation.

7. Managing potential conflicts of interest

7.1 Appendix A gives guidance on how managers should assess and manage conflicts of interest and influence.

7.2 Where a potential or actual conflict of interest or influence is identified, a conflict of interest and influence plan should be prepared in discussion with the member of staff and the Head of Department (Director)/Line Manager to ensure that appropriate action is taken to minimise the



potential effect of the relationship on other staff or students, and to protect the member of staff and student. The member of staff will be required to comply with the actions specified in the conflict of interest and influence plan. A record of the conflict of interest and influence plan will be retained by the Foundation in accordance with its Data Privacy policy. It is good practice to review the conflict of interest and influence plan annually (for example at the start of each academic year), or more frequently if necessary.

- 7.3 If it is agreed that there is no conflict of interest or influence, this should be notified to the member of staff. This will be retained by the Foundation in accordance with its Data Privacy policy. The Foundation reserves the right to review this if circumstances change.
- 7.4 A student involved in a relationship should not be disadvantaged due to the relationship.
- 7.5 Where an intimate personal relationship breaks down, the student expects that the member of staff and the student will continue to conduct themselves in an appropriate and professional manner. The conflict of interest and influence plan should be reviewed and consideration given to whether the actions should be maintained.

8. Breach of the policy and non-disclosure

- 8.1 Subject to the exceptions above, no member of staff should commence or pursue an intimate personal relationship with a student. Should this event occur, this will be a breach of the policy and the Foundation will manage this through the staff disciplinary procedure.
- 8.2 Failure on the part of a member of staff to declare an intimate personal relationship or a close personal relationship with a student (as set out in section 4) may result in disciplinary action being taken for non-disclosure. The Foundation will manage this through the staff disciplinary procedure.



8.3 Staff who are uncertain about what action to take should seek guidance from the Corporate Services team.

9. Further Action

9.1 Where a student considers they have been personally adversely affected by a misuse of power, influence, or authority or by a conflict of interest, they should raise it with their tutor and the Director of Education Services in the first instance.

9.2 Where a member of staff considers they have been personally adversely affected by a misuse of power, influence, or authority or by a conflict of interest, they should raise it with their line manager/Head of Department or HR in the first instance.

9.3 Formal complaints can be submitted through the Student Complaints Procedure, Sexual Misconduct Policy and Procedure for students, Policy on Dignity at Work and Study, or Staff Grievance Procedure.

9.4 Where the Foundation is made aware of a relationship, following the steps above or other means, appropriate action will be taken to investigate and manage this as sensitively as possible. Appropriate action will be taken which may result in [disciplinary](#)

10. Definitions

10.1 Abuse of power: All staff must recognise the power imbalance by the very nature of the staff and student relationship and always act in a respectful and fair manner. Abuse of power means a situation where a member of staff exploits a position of power in relation to a student, so as to apply pressure in a way which may result in the student doing something, or refraining from doing something, that they may not have otherwise done and that action or inaction could reasonably result in something that falls within the scope of an intimate personal



relationship. Abuse of power can take various forms and may include, but is not limited to, coercion, bullying, manipulation, putting pressure on others to engage in conduct they do not feel comfortable with and sexual misconduct.

10.2 Sexual misconduct means any unwanted or attempted unwanted conduct of a sexual nature and includes but is not limited to:

- sexual harassment,
- sexual assault;
- rape;
- and may include, grooming, coercion and bullying, sexual demands, propositions and exchanges, verbal and non-verbal communications, and the creation of a sexualised environment.

10.3 Harassment has the meaning given in section 26 of the Equality Act 2010 and section 1 of the protection from Harassment Act 1997 (in its entirety, and as interpreted by section 7 of the Act).

10.4 Consent to an intimate personal relationship: In order to have an intimate personal relationship consent must be given, but individuals must have the choice, freedom and capacity to give consent. It should not be assumed that this is always the case. The person seeking consent must ensure that it is freely given and is an informed decision. They must also be aware that it can be withdrawn at any time and past consent does not mean present consent.

10.5 Freedom to consent: In order to have freedom to consent a person must not fear the result of not consenting. A person is not free to choose if, for example, they are being threatened or they could perceive they are being threatened, if their studies and assessments could be affected, if their future career could be affected or a power imbalance means they are being pressurised to commence or continue the relationship. The



University takes the position that where there is an imbalance of power it is unlikely that consent can be freely given out of choice.

- 10.6 Capacity to consent:** In order to have the capacity to consent a person must have the mental and physical capacity to consent. This can be a one off or an ongoing situation. For example, capacity to consent may be affected by the influence of drugs or alcohol or the presence of a cognitive or learning difficulty, or mental health condition. Staff also need to be aware that a personal intimate relationship with a student under the age of 18 is covered in the Sexual Offences Act (2003), please see [sexual misconduct policy](#) for more information.
- 10.7 Sexualised:** In this policy the use of the word sexualised means to make sexual, or attribute sex or a sex role to a situation or to give sexual associations to a situation.



Appendix 1

1. Introduction

A conflict of interest and influence under the Staff/Student Relationships Policy refers to a perceived, potential or actual conflict of interest or influence.

The Foundation recognises its responsibility to support staff and students to ensure that close personal relationships are declared to ensure that the conflicts of interest are managed, mitigated or eliminated.

2. How to manage conflicts of interest and influence

The management of conflicts of interest and influence is essential for the Foundation to provide and maintain a supportive and inclusive environment. These guidelines allow all parties to protect the integrity of all students and staff from allegations of actual or perceived conflicts of interest and influence and minimise the risk of complaints of harassment and grievance or disciplinary action.

Steps must be taken to ensure that a student involved in a relationship should not be disadvantaged.

A conflict of interest and influence plan should ensure that appropriate action is taken to minimise the potential effect of the relationship on other staff or students.

The process for managing conflicts of interest should take into account all options below. It is likely that a series of actions are put in place to manage, mitigate or eliminate the conflict of interest.

- Record – use the conflict of interest declaration and management form to declare any conflicts of interest.
- Restrict - where a conflict of interest exists or is perceived to exist it will be necessary to ensure that the member of staff;



- does not have sole responsibility for aspects of the student's work which require judgement, e.g. academic assessment.
- is not solely in a position to take decisions affecting the student, including the provision or withholding of any of the following: facilities for research; the allocation of places on courses, bursaries or scholarships for research.
- Recruit – use a third party or increase numbers on panel to oversee impartiality.
- Remove – the removal of the staff member from decision making or relevant activity related to this.
- Relinquish – the staff member relinquishes the interest, for example where there is a business conflict of interest.

To protect the interests of all parties, a record of the conflict of interest and influence plan will be made. It is good practice to review the conflict of interest and influence plan annually (for example at the start of each academic year), or more frequently if necessary.