



# Oakswood College

Empowering Through Education



## Personal Relationships

### *Declaration Procedure*

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**Oakwood College**  
Empowering Through Education  
*(Trading name of Oakwood Group Ltd)*

## **Personal Relationships Disclosure Procedure (APPENDIX A to Personal Relationships Policy)**

NB Appendix B: Personal Relationships Declaration Form sits alongside this procedure.

### **Key information about this procedure:**

- It sets out clear steps for staff (and, where applicable, students) to disclose Personal Relationships in accordance with the College's Personal Relationships Policy.
- It ensures that any actual or perceived conflicts of interest arising from Personal Relationships are identified, recorded, and managed in a fair, timely and proportionate way.
- This procedure applies to all Oakwood College staff (including permanent, temporary, freelance, visiting, volunteer and contracted staff) who have, or may have, a Personal Relationship as defined in the Policy.
- Students are not required to disclose Personal Relationships, but this procedure explains what will happen when they choose to do so or when a concern is raised.

### **GUIDANCE NOTE: When a Personal Relationship must be disclosed**

Staff must disclose a Personal Relationship where any of the following apply:

- A close personal or intimate relationship with a registered student or an applicant (if known to them).
- A close personal or intimate relationship with another staff member (including where the relationship predates one or both parties joining Oakwood College).
- Any other personal, intimate, familial or financial relationship that could reasonably give rise to an actual or perceived conflict of interest in relation to teaching, assessment, supervision, pastoral care, recruitment, line-management or any other professional responsibility.

Where both parties are staff:

- If they are of equal status, both individuals are responsible for ensuring the relationship is disclosed.
- If one is more senior, the senior member of staff carries primary responsibility for disclosure.

Student–student relationships do not normally need to be disclosed. However, where a student is also employed by Oakwood College, they must comply with this procedure in their capacity as a staff member. This means that a student-student relationship would need to be disclosed by the student who is also employed as a staff member.

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## **PERSONAL RELATIONSHIP DECLARATION PROCEDURE**

### **How to disclose a Personal Relationship**

#### **1. Completing the Declaration Form**

1.1 The staff member must complete the Personal Relationships Declaration Form (Appendix B to the Policy) as soon as they become aware that a Personal Relationship falls within scope.

1.2 The form should include:

- Names and roles of both parties.
- Nature of the relationship (e.g. intimate, familial, financial, another close personal).
- Any known or likely areas of professional interaction (e.g. teaching, assessment, line-management, admissions, pastoral care).

- Any immediate concerns about conflicts of interest or perceived power imbalance.

## **2. Submitting the Declaration**

- The completed form must be submitted to the Head of Operations and HR or to the staff member's Line Manager.
- Where submitted to a Line Manager, the Line Manager must promptly forward the form to HR and confirm to the staff member in writing that this has been done.

## **3. Annual Confirmation**

3.1 On an annual basis, HR will ask all staff either to:

- Confirm that they have no relevant Personal Relationships to declare; or
- Submit a new or updated Personal Relationships Declaration Form.

## **4. Initial review and interim measures**

4.1 HR (and, where appropriate, the relevant Line Manager or senior manager) will carry out an initial review of the declaration to:

- Confirm that the relationship falls within the scope of the Policy.
- Identify any immediate or potential conflicts of interest or safeguarding concerns.
- Decide whether urgent interim measures are required.

4.2 Where necessary, the College may, without prejudice, temporarily adjust duties while the situation is reviewed, for example:

- Removing a staff member from direct teaching, assessment, supervision or pastoral responsibility for the other party.
- Re-allocating line-management responsibilities or panel membership (e.g. recruitment, disciplinary, complaints panels).
- Adjusting involvement in admissions, offers or progression decisions affecting the other party.

## **5. Conflict management plan**

5.1 Where a Personal Relationship is permitted under the Policy but creates a potential conflict of interest, HR will coordinate an appropriate conflict management plan in consultation with relevant managers. This may include:

- Re-assigning teaching, assessment or supervisory responsibilities.
- Changing personal tutor or mentor arrangements.
- Excluding the staff member from specific decision-making processes relating to the other party.
- Implementing communication boundaries in the professional context.
- Any other reasonable measures that on balance would remove or mitigate a conflict of interest.

5.2 The agreed measures will be:

- Recorded in a brief note attached to the Declaration Form.
- Communicated in writing to the staff member (and, where appropriate, the student or other staff member) with clear expectations, timescales and review points.

5.3 Where, exceptionally, a conflict of interest cannot reasonably be managed (for example, because of safeguarding concerns), the matter may be escalated to the Chief Executive Officer and, where relevant, managed under safeguarding, HR or disciplinary procedures.

## **6. Student disclosures and third-party concerns**

6.1 Where a student discloses a Personal Relationship involving a staff member:

- The staff member receiving the disclosure must refer the matter to HR (or the Designated Safeguarding Lead if there is any safeguarding concern).
- HR will check the Register of Personal Relationships and invite the relevant staff member to submit a declaration if they have not already done so.
- The student will be advised of the next steps and signposted to appropriate support (e.g. Student Services, safeguarding, complaints).

6.2 Concerns raised by others/third parties (e.g. colleagues, students, placement providers) about an undisclosed relationship will be referred to HR for preliminary enquiry and, where appropriate, may be treated as:

- A potential breach of this Policy; and/or
- A safeguarding or misconduct concern under relevant procedures.

## **7. Non-compliance and breaches**

7.1 Failure by staff to disclose a relevant Personal Relationship, or to comply with an agreed conflict management plan, will normally be treated as a breach of the Personal Relationships Policy and may lead to action under the Staff Disciplinary Procedure, up to and including dismissal in serious cases.

7.2 Prohibited relationships (for example, intimate relationships with under-18s or adults at risk, or serious abuses of power) will be managed under safeguarding and/or disciplinary procedures and may result in referrals to external agencies where required.

## **8. Record-keeping, confidentiality and monitoring**

8.1 HR will:

- Store Personal Relationships Declaration Forms securely on the staff member's HR file, with access restricted to those who need to know.
- Maintain a confidential Register of Personal Relationships, updated whenever declarations are made or amended.
- Routinely contact staff at the start of each academic year to remind them of the Policy and the requirement to declare.

8.2 Data will be processed in line with UK GDPR, the Data Protection Act 2018 and Oakswood College's data protection policies. Only information that is necessary to manage conflicts of interest and meet safeguarding and regulatory obligations will be recorded and shared.

8.3 Appropriately anonymised or redacted data from the Register will be reported periodically to the Board of Governors for oversight and assurance purposes.

## **9. Advice and support**

9.1 Staff who are unsure whether a relationship needs to be declared, or how to complete the Declaration Form, are encouraged to seek confidential advice from:

- Their Line Manager; and/or
- The Head of Operations and HR.

9.2 Students who are concerned about a relationship, or about possible breaches of this Policy, should be signposted to:

- Student Support services, and/or
- The College's Student Complaints Procedure, Staff Grievance Procedure, Policy on Sexual Misconduct, Harassment & Unacceptable Behaviours, Prevent & Safeguarding Policy, or Whistleblowing Policy as appropriate.