

Code of Practice for Intimate Personal Relationships

Academic year 2025/26

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1. Purpose

- 1.1. This *Code* sets out the University of Surrey's position in relation to Intimate Personal Relationships between students and staff. Where reference is made to members of staff, this includes situations where a student is acting in a staff capacity.

2. Scope and Exceptions to the Code

- 2.1. This *Code* applies to all Members of the University, without exception.

3. Definitions and Terminology

Adult At Risk

An Adult At Risk is an individual (aged 18 years old or older) who:

- has needs for care and support,
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

Bullying

The University defines Bullying as unwanted conduct from a person or group that is:

- offensive, intimidating, threatening, malicious or insulting, and/or
- an abuse or misuse of power that undermines, humiliates or causes physical or emotional harm to another person or persons.

These Regulations should be read in conjunction with the [*Harassment and Bullying Procedure*](#).

Harassment

For the purposes of this *Code*, the term 'Harassment' applies to behaviour within the definitions found in:

- section 26 of the Equality Act 2010 (<https://www.legislation.gov.uk/ukpga/2010/15/section/26>) and/or
- section 1 of the Protection from Harassment Act 1997 (in its entirety, and as interpreted by section 7 of the Act) (<https://www.legislation.gov.uk/ukpga/1997/40/section/1>).

The definitions in both pieces of legislation above ought to be consulted in conjunction with this *Code* and the [*Harassment and Bullying Procedure*](#).

Intimate Personal Relationship

An Intimate Personal Relationship means a relationship involving one or more of the following:

- physical intimacy (including isolated or repeated sexual activity)
- romantic intimacy
- emotional intimacy

Members of the University

Members of the University means current members of staff (including staff in University of Surrey subsidiaries and Surrey Sports Park staff), members of Council and students at the University of Surrey including (but not limited to):

- applicants to the University who have accepted an offer of a place of employment or study;
- those registered on the Foundation Year and award-bearing programmes delivered by the University (this includes new students who have been through the online registration process and have yet to complete the main registration process) and students on their Professional Training Year;
- those registered to study for the award of academic credit delivered by the University;
- those registered to study for non-credit bearing modules/courses and non-award-bearing programmes delivered by the University;
- those registered as a student with another organisation operating in collaboration with the University and using University facilities, for example, Surrey International Study Centre (SISC);
- those registered as a student participating in an exchange scheme.

Misconduct

Misconduct is unacceptable behaviour, including but not limited to:

- actions which cause actual or potential distress or harm (physical or psychological) to another person irrespective of whether or not distress or harm was intended;
- actions which cause actual or potential reputational damage to the University;
- actions which disrupt the normal operations, and/or safe use of, the University;
- actions which impede or interfere with the pursuance of work/study of University members.

In all cases, this includes behaviour that takes place in person as well as behaviour via other mediums, such as social media. This applies at all times of day and includes behaviour away from University premises.

Prohibited Relationship

A Prohibited Relationship is:

- an Intimate Personal Relationship between any member of staff and a student under 18 years of age;
- an Intimate Personal Relationship between any member of staff and a student who is an Adult At Risk;
- an Intimate Personal Relationship between a member of staff and a student where the member of staff is a Relevant Staff Member in relation to that student, and one or more of the following applies:
 - the student is a postgraduate research student and the Relevant Staff Member is a member of that student's supervisory team;
 - after a formal review by the University, it is not possible, in the circumstances, to implement sufficient measures to safeguard the student and the Relevant Staff Member and adequately address any actual or potential conflict of interest or abuse of power that may arise between them.

Relevant Staff Member

A Relevant Staff Member means a member of staff (including but not limited to a student in a staff role, an employee (including for a University of Surrey subsidiary) and a contractor), who has direct academic responsibilities, or other direct professional responsibilities, in relation to a student.

Relevant Staff Members can include (but are not limited to):

- teaching staff, such as lecturers or graduate teaching assistants;
- dissertation or project supervisors;
- professional/technical services staff who support teaching;
- personal tutors and pastoral support staff;
- any member of staff with decision making responsibility in relation to a student's assessment and/or progression;
- any member of staff with decision making responsibility in relation to a student's employment prospects within the University;
- senior members of staff with responsibility or oversight of wider institutional strategy, processes and delivery, for example, members of the Executive Board;
- Campus Safety staff.

Sexual Misconduct

Sexual Misconduct is conduct, or attempted conduct, that is directed at a person without (and in some circumstances with) their consent and which is of a sexual nature. This includes but is not limited to:

- Sexual Harassment (as defined by [s26\(2\) and s26\(3\) Equality Act 2010](#))
- Sexual Assault (as defined by [s3 Sexual Offences Act 2003](#))
- Rape (as defined by [s1 Sexual Offences Act 2003](#))

This includes Misconduct through any medium, for example online. In some circumstances, conduct or attempted conduct that is wanted may still constitute Sexual Misconduct.

These Regulations should be read in conjunction with the [Sexual Misconduct Procedure](#).

Procedural Principles

4. The University's approach to Intimate Personal Relationships between staff and students

- 4.1. The University values good professional relationships between all members of its community. These relationships may be between staff members, staff members and students or between students. Any such relationship should be supportive, enabling good communication and creating a safe environment for all to thrive. Trust and confidence are important elements of these relationships.
- 4.2. However, Intimate Personal Relationships between staff and students are strongly discouraged by the University. Professionalism is highly valued at Surrey, and

Intimate Personal Relationships between staff and students can result in unprofessionalism and/or a perception of unprofessionalism. Relationships of this nature may give rise to conflicts of interest and/or abuses of power, whether actual or perceived. All these factors can cause detriment to those directly involved, as well as the wider University community.

- 4.3. The University is committed to fostering a climate of openness and understanding. Whilst such relationships are always strongly discouraged, and there are instances where they are prohibited entirely, it is recognised that relationships of this kind can and do occur. The University believes that, where the Intimate Personal Relationship is not prohibited, and there is no issue of potential or actual Misconduct by a staff member and/or student involved, a dialogue with the relevant parties can assist. Such a dialogue has the aim of protecting all concerned and measures may be explored to negate any conflict of interest/abuse of power.
- 4.4. Staff are strongly advised to seek advice from Human Resources (HR) prior to or at the commencement of an Intimate Personal Relationship.

5. What is an Intimate Personal Relationship?

- 5.1. An Intimate Personal Relationship is a relationship involving one or more of the following:
- physical intimacy (including isolated or repeated sexual activity)
 - romantic intimacy
 - emotional intimacy
- 5.2. In determining what is and is not an Intimate Personal Relationship between a student and a staff member, a commonsense approach should be adopted, based on the definition above, and the circumstances of the parties' involvement. The determination will include an objective assessment as to whether a reasonable person would consider the relationship to be an Intimate Personal Relationship. For example, there may be circumstances where a sense of intimacy is experienced, within a professional setting, which does not necessarily constitute an Intimate Personal Relationship. For example, a staff member engaging compassionately and considerately with a student, on a professional basis, as part of their role as a personal tutor. In addition, it is recognised that some academic courses involve a greater degree of physicality between staff and students. Local guidance should be consulted in these cases, for example the Intimacy Guidelines published by the Guildford School of Acting.
- 5.3. A single isolated incident may constitute a relationship for the purposes of this *Code*. Duration of the 'relationship' is not, of itself, determinative, although the length of the relationship may be a relevant consideration in the objective, case by case assessment as to whether a reasonable person would consider the relationship to constitute an Intimate Personal Relationship.

- 5.4. An Intimate Personal Relationship is one which can create both real and perceived conflicts of interest for both students and staff members. Such relationships also give rise to the risk of abuse of power. Typically, but not in all cases, the balance of power is likely to rest with the most senior person in the relationship or with the individual who has the perceived ability to impact the other individual's circumstances regardless of resistance. This may, for example, take the form of assessments being marked more severely.
- 5.5. Where an Intimate Personal Relationship involves, or may involve, Sexual Misconduct and/or Misconduct, this *Code* should be read in conjunction with the University's [Student Disciplinary Regulations](#) or [Staff Disciplinary Procedure](#) (as applicable) and the [Sexual Misconduct Procedure](#) (if relevant). Further support and information can additionally be found on the Single Comprehensive Source of Information.
- 5.6. What should I do if I am not sure if I am in an Intimate Personal Relationship or am not sure whether I need to report my Intimate Personal Relationship?
- 5.6.1. Staff members are advised to contact the HR Advisory Team (HRAdvisory@surrey.ac.uk) and/or their local HR Business Partner at the earliest opportunity. They will be able to advise as to whether the relationship is reportable and, if it is, can take steps to safeguard both parties.
- 5.6.2. Whilst the onus to report is on staff, students are strongly encouraged to contact OSCAR (oscar@surrey.ac.uk) for advice on the application of this *Code*. The Students' Union is also available for impartial advice and support.

6. Categories of Intimate Personal Relationships

- 6.1. Intimate Personal Relationships involving staff and students can be categorised as follows:
- Prohibited
 - Not prohibited but subject to a reporting requirement
 - Not prohibited and not subject to a reporting requirement

7. Prohibited Intimate Personal Relationships

- 7.1. From the outset, the University strictly prohibits Intimate Personal Relationships where the staff member is a Relevant Staff Member, and it is reasonably foreseeable that it will not be possible to implement measures to safeguard the student and the Relevant Staff Member or to adequately address any actual or potential conflict of interest or abuse of power that may arise between them.
- 7.2. An example of circumstances involving a Prohibited Intimate Personal Relationship is where a student's course involves specialist teaching that can only be provided by the Relevant Staff Member with whom they are in an Intimate Personal Relationship. It is not possible to implement measures to safeguard the student and the Relevant Staff

Member and, therefore, relationships in these circumstances are strictly prohibited from the outset.

- 7.3. Doctoral supervisors can have a significant ability to influence the progress and circumstances of postgraduate research students, and Intimate Personal Relationships can entail a particularly acute power imbalance. Doctoral supervisors tend also to be more specialist and, therefore, safeguarding options, such as substituting the Relevant Staff Member, are considerably less viable. In addition, the implementation of such measures would be likely to lead to disruption to the student's study. As a result, Intimate Personal Relationships between postgraduate research students and members of their supervisory team are strictly prohibited from the outset.
- 7.4. If this prohibition is contravened, the Relevant Staff Member would usually be subject to disciplinary proceedings, the outcome of which could be dismissal. A failure to report a Prohibited Intimate Personal Relationship is a separate breach of this *Code*, it will be considered aggravating and is likely to result in a more severe outcome.
- 7.5. All reasonable efforts would be made to find an alternative staff member who is able to facilitate the continuation of the student's study. Where the continuation of the student's work cannot be facilitated, consideration would be given to changing the focus of the PhD (for example). In extremely rare cases, this may require a postgraduate research student to transfer to a different higher education provider.
- 7.6. Intimate Personal Relationships between members of staff and persons under 18 years of age or Adults At Risk are always prohibited regardless of whether the member of staff is a Relevant Staff Member.
- 7.7. Staff are reminded that Intimate Personal Relationships involving students (including applicants or offer-holders) under the age of eighteen or where the student is an Adult At Risk, could additionally fall within the scope of the [Sexual Offences Act 2003](#). If any such cases arise, the University will consider whether to notify the police, in addition to taking disciplinary action.

8. Intimate Personal Relationships not prohibited but subject to a reporting requirement

- 8.1. When is an Intimate Personal Relationship subject to a reporting requirement?
- 8.1.1. There are circumstances where reporting of an Intimate Personal Relationship to the University is mandatory.
- 8.1.2. A relationship between a member of staff and a student needs to be reported when:
- the relationship meets the definition of an Intimate Personal Relationship (for assistance, see section 5 above) and,
 - the member of staff in the relationship is a Relevant Staff Member.

- 8.1.3. A Relevant Staff Member is someone who has direct academic or other direct professional responsibilities in relation to the student that they are in a relationship with.
- 8.1.4. Direct academic responsibilities include, but are not limited to, teaching, supervision and assessment. Individuals with direct academic responsibility may include personal tutors and programme leaders.
- 8.1.5. Direct professional responsibilities include, but are not limited to, staff providing mental health support, pastoral support, diversity and neuroinclusion support, operating student complaint processes and Campus Safety personnel.
- 8.1.6. This includes circumstances where a student and staff member were in an Intimate Personal Relationship and, in the course of that relationship, the staff member assumed direct academic and/or professional responsibilities in relation to that student and, therefore, became a Relevant Staff Member.
- 8.1.7. Where an individual is a student who also works at the University of Surrey, that individual may be captured by the definition of a Relevant Staff Member if they have direct academic responsibility or other direct professional responsibility for another student. If this applies, and the individual is in an Intimate Personal Relationship with the student for whom they have direct responsibility, the individual should contact The Office of Student Complaints, Appeals and Regulation (OSCAR) (oscar@surrey.ac.uk) for advice.
- 8.2. I am in an Intimate Personal Relationship that should be reported. When must the relationship be reported?
- 8.2.1. If the staff member is already a Relevant Staff Member in relation to the student when the Intimate Personal Relationship begins, the Relevant Staff Member must report immediately.
- 8.2.2. If the staff member is not a Relevant Staff Member in relation to the student when the Intimate Personal Relationship begins and it is not a Prohibited Intimate Personal Relationship, there is no requirement to report. However, this will change if the staff member later becomes a Relevant Staff Member in relation to the student that they are in an Intimate Personal Relationship with. As soon as they become a Relevant Staff Member, the relationship must be reported by the member of staff immediately.
- 8.2.3. This Code comes into force on 1 August 2025. Where, on this date, a member of staff is already in an Intimate Personal Relationship with a student in respect of whom they are also a Relevant Staff Member or they are in a Prohibited Intimate Personal Relationship, they must notify their local HR Business Partner within two months immediately following the commencement date of the Code (by 1 October 2025). Staff should email the HR Advisory Team

(HRAdvisory@surrey.ac.uk) to find out who their local HR Business Partner is if unsure.

8.3. I am in an Intimate Personal Relationship that needs to be reported. Who should report the relationship and who should they report it to?

8.3.1. The onus to report is on the member of staff in the Intimate Personal Relationship. Staff members must report their Intimate Personal Relationship to their local HR Business Partner or their local HRA [Who we are - Human Resources | Surreynet](#). Staff are advised to contact the HR Advisory Team (HRAdvisory@surrey.ac.uk) to find out who their local HR Business Partner is if unsure.

8.3.2. Whilst the onus to report is on staff, students are strongly encouraged to contact OSCAR (oscar@surrey.ac.uk) as soon as they become aware that they are in an Intimate Personal Relationship where the staff member has direct academic responsibility or other direct professional responsibility for them. A failure to do so will not result in disciplinary proceedings against the student, however, it is considered to be within the student's best interests to report such relationships. This will enable the University to ensure, as far as possible, that the student is not disadvantaged by the relationship and to safeguard against conflicts of interest or abuses of power.

8.4. I am not in an Intimate Personal Relationship, but I am aware of one that should be reported. What should I do?

8.4.1. Students and/or staff members are entitled to inform the University of Intimate Personal Relationships that they are not themselves a party to. However, malicious allegations in this regard will not be tolerated and may constitute an act of Misconduct within the [Student Disciplinary Regulations](#) / [Staff Disciplinary Procedure](#) (as applicable).

9. How will the University respond to a report of an Intimate Personal Relationship between a member of staff and a student?

9.1. The University will check whether the Intimate Personal Relationship is one that is subject to a reporting requirement. Where no reporting requirement applies, the University will take the steps outlined in section 10 of this *Code* (below).

9.2. If the Intimate Personal Relationship is one that is subject to a reporting requirement because it is a Prohibited Intimate Personal Relationship, the University will take the steps outlined in section 7 of this *Code* (above).

9.3. If the Intimate Personal Relationship is one that is subject to a reporting requirement, but it is not a Prohibited Intimate Personal Relationship, the University will take steps to negate any actual or perceived conflicts of interest and/or abuses of power (where feasible). When managing actual or potential conflicts of interest and/or abuse of power arising in an Intimate Personal Relationship, the University will take steps to ensure that the student is not disadvantaged or unfairly advantaged.

9.4. Information will be shared with a limited group to enable safeguards to be put in place, if required. For example, an academic member of staff should not be involved in the assessment of the work of a student that they are in an Intimate Personal Relationship with. Safeguards would need to be implemented. This is primarily to protect impartiality and enable a continued safe environment for work and study. This also serves to protect the member of staff from the possibility of accusations of favouritism and to prevent conflicts of interest.

9.5. The University will take reasonable steps to:

- amend the responsibilities of the Relevant Staff Member so that they are no longer a Relevant Staff Member in relation to the student with whom they are in an Intimate Personal Relationship;
- manage the academic and/or professional interaction between the Relevant Staff Member and the student in the Intimate Personal Relationship in order to protect the student's academic, employment and pastoral interests from compromise or disadvantage. This includes, but is not limited to, putting in place a mechanism to prevent the Relevant Staff Member from influencing, or appearing to influence, the student's academic results or reference;
- prevent against a potential or actual unfair advantage to the student, for example, in assessment, references or academic or employment opportunities, and
- promote avenues by which the student can report Misconduct through a mechanism that does not involve the Relevant Staff Member with whom they are in an Intimate Personal Relationship.

10. Intimate Personal Relationships not prohibited and not subject to a reporting requirement

10.1. Where an Intimate Personal Relationship is reported to the University that is not prohibited and no reporting requirement applies, the University will take the following steps:

- record the report;
- reiterate the need to report in the future if a party to the relationship becomes a Relevant Staff Member in relation to a student party in the relationship;
- highlight the support options available to both parties;
- highlight to both parties the existence and location of the Single Comprehensive Source of Information which includes information on behaviours that may amount to abuse of power and/or coercion and the reporting options in relation to inappropriate behaviours from staff.

10.2. Whilst the University strongly discourages Intimate Personal Relationships between staff and students, if there are no concerns, no further actions will be taken at this stage.

10.3. There may be circumstances where, although the Intimate Personal Relationship is not prohibited, and not subject to a reporting requirement, there are concerns about the conduct of the staff member and/or student involved. In such circumstances, it will

be considered whether the conduct of the member of staff and/or student may constitute a disciplinary offence under the [Staff Disciplinary Procedure](#) or [Student Disciplinary Regulations](#) (as applicable). Staff are strongly advised to seek advice from HR prior to the commencement of an Intimate Personal Relationship with a student.

11. What happens if I do not comply with this Code?

- 11.1. Staff in an Intimate Personal Relationship with a student will not be in breach of this Code, unless, it is a Prohibited Intimate Personal Relationship or, whilst in an Intimate Personal Relationship:
- they are or become a Relevant Staff Member and fail to report this in line with this Code to their local HR Business Partner,
 - they have failed to abide by measures put in place by the University to address the Intimate Personal Relationship,
 - their conduct constitutes Misconduct for the purposes of the [Staff Disciplinary Procedure](#), irrespective of whether they are a Relevant Staff Member in respect of the student concerned.
- 11.2. In any of the circumstances listed in section 11.1 above, disciplinary action may be taken.
- 11.3. Where the facts of the Intimate Personal Relationship itself are found to constitute Misconduct, additional factors such as failure to report, will be considered aggravating and are likely to result in a more severe outcome.
- 11.4. Students will not be subject to disciplinary action by the University for being in an Intimate Personal Relationship with a member of staff.

12. Misconduct in Intimate Personal Relationships

12.1. Advice for students

- 12.1.1. Students can report and seek support for Misconduct occurring within an Intimate Personal Relationship with a staff member (including but not limited to Harassment, Bullying and/or Sexual Misconduct), regardless of whether this relationship has been previously reported, whether it involves a Relevant Staff Member, or whether it is a Prohibited Intimate Personal Relationship.
- 12.1.2. The University's priority is the safety of its members. Students will not be penalised by the University for participating in an Intimate Personal Relationship with a staff member, and measures will be implemented to protect against any retaliation by that staff member if the student makes an allegation against them in relation to Misconduct (including but not limited to Harassment, Bullying and/or Sexual Misconduct). Where there are concerns in relation to actual or potential retaliation by a staff member, a risk assessment will be

conducted by OSCAR, where relevant, assisted by the Human Resources team.

12.1.3. Students are advised to read the University's [Harassment and Bullying Procedure](#) or [Sexual Misconduct Procedure](#) (as applicable) and [Staff Disciplinary Procedure](#) in conjunction with this Code. Further support and information can additionally be found on the Single Comprehensive Source of Information.

12.2. Advice for staff

12.2.1. Staff can report and seek support for Misconduct occurring within an Intimate Personal Relationship with a student (including but not limited to Harassment, Bullying and/or Sexual Misconduct), regardless of whether this relationship has been previously reported, regardless of whether they are a Relevant Staff Member in relation to that student and regardless of whether it is a Prohibited Intimate Personal Relationship.

12.2.2. An allegation of student Misconduct arising within the context of an Intimate Personal Relationship will be considered in conjunction with the [Student Disciplinary Regulations](#).

12.2.3. Staff are advised that where such an allegation is made, if, in the course of an investigation, it becomes apparent that:

- the allegation involves a Prohibited Intimate Personal Relationship, or
- they are a Relevant Staff Member in relation to the student subject of the allegation and:
 - the Intimate Personal Relationship has not been reported in line with this Code or
 - the Relevant Staff Member has failed to abide by measures put in place by the University to manage an Intimate Personal Relationship,this may constitute a breach of the [Staff Disciplinary Procedure](#) and may result in a separate disciplinary process for the member of staff.

12.2.4. Where 12.2.3 applies, consideration will be given as to how to proceed. The University's priority is to safeguard the wellbeing of both the member of staff and the student and avoid actual or perceived conflicts of interest and/or abuses of power. Support options will be discussed, and both the member of staff and the student will receive support from the University.

12.2.5. Staff are advised to read the University's [Harassment and Bullying Procedure](#) or [Sexual Misconduct Procedure](#) (as applicable), [Student Disciplinary Regulations](#) and, if applicable, [Staff Disciplinary Procedure](#) in conjunction with this Code. Further support and information can additionally be found on the Single Comprehensive Source of Information.

13. Confidentiality/Information Sharing

- 13.1. The University collects information sensitively and treats it with appropriate confidentiality, irrespective of the mechanism used to raise an incident.
- 13.2. Throughout all proceedings, the University will act in compliance with data protection legislation. It may be necessary to share sensitive information in order to facilitate an investigation. Details of relevant privacy notices can be found here: <https://www.surrey.ac.uk/student-support-services-privacy-notice>
- 13.3. Under data protection legislation, the University may share personal data with the consent of the data subject, unless there is a stated exception (see below). If, during any proceedings in which an individual is involved, they request access to such data as being relevant to the proceedings, the individual may be referred to the “Make a Privacy Request” web form at: <https://www.surrey.ac.uk/information-governance/make-privacy-request>.
- 13.4. In exceptional circumstances, information may be shared with appropriate authorities, including external entities (e.g. Police, Social Services), without the consent of the data subject. This includes, but is not limited to, where it is necessary to protect the vital interests of the data subject and/or where a safeguarding concern has been raised. This may include information of a personal and/or sensitive nature. With respect to safeguarding concerns, this would normally be in consultation with the University’s Safeguarding Officer.
- 13.5. Information, including that of a personal and/or sensitive nature (special category data), may be shared between members of University staff, and/or members of staff of the Surrey International Study Centre (SISC), and/or other appropriate authorities/institutions, where there is an appropriate lawful basis for the sharing and it is deemed necessary, in order to facilitate the effective functioning of the University’s policies and procedures, and/or to ensure the safety of members of, and visitors to, the University, in accordance with relevant privacy notices.
- 13.6. A failure to appropriately respect confidentiality and/or data protection requirements could result in disciplinary action being taken against that individual.
- 13.7. Anonymised aggregated information concerning Student Disciplinary, Fitness to Practise, or other student/staff casework, may be shared publicly, and/or form part of training exercises, where such information is considered to be of wider interest or relevance. This would be in accordance with relevant privacy notices, and normally in consultation with the Information and Governance team, if appropriate.