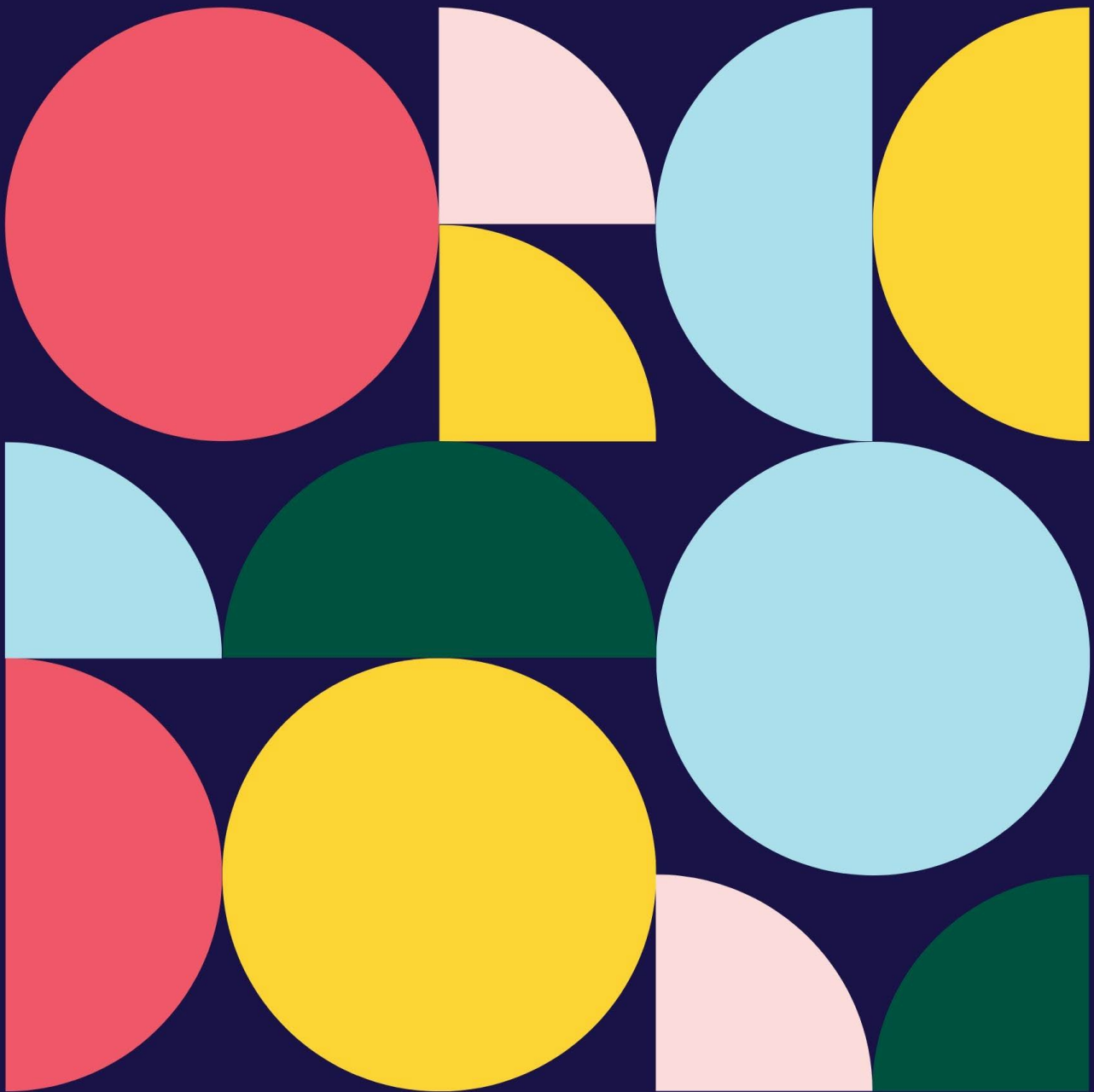




Staff Conflicts of Interest and Intimate Personal Relationships Policy

Owner: Director of People, Culture and Organisational Development
Approval: Trustees



Bristol SU

Date created: Oct 2020
Date reviewed and approved: Oct 2025
Date next review: Oct 2027

Staff Conflicts of Interest and Intimate Personal Relationships Policy

1. Purpose

1.1 The purpose of this policy is:

- 1.1.1 To explain what is meant by the term conflict of interest.
- 1.1.2 Detail measures and procedures that should be taken to prevent such conflict occurring.
- 1.1.3 Outline how any potential conflict of interest should be managed.
- 1.1.4 To explain what is meant by the term intimate personal relationships.
- 1.1.5 To set clear expectations around intimate personal relationships between students and staff. It is designed to set clear expectations around professional boundaries, protect the interests of staff and students, and prevent conflicts of interest and/or abuse of power as part of our commitment to foster a safe environment for students.

2. Introduction on approach to conflicts of interest

- 2.1 A conflict of interest is defined as ‘any situation in which a staff members personal interests or loyalties could, or could be seen to, prevent them from making a decision only in the best interests of the Students’ Union’.
- 2.2 This could be a financial or personal interest that an individual may have, in a relationship or proposed relationship between Bristol SU and an external body, or between individuals or groups involved within Bristol SU.
- 2.3 Bristol SU recognises that it is almost inevitable that conflicts may occur and that sometimes the appearance of a conflict of interest can damage Bristol SU’s reputation.
- 2.4 It is up to each individual to decide whether a conflict of interest could exist and, if so, to declare the conflict. You should err on the side of caution, declaring an interest if there is a possibility that a conflict could exist.
- 2.5 All Bristol SU staff must not use their position for personal gain and should act at all times in good faith and in the interests of the Students' Union.

3. Personal Relationships

- 3.1 Personal relationships between staff and elected officers, or staff and students could lead to a conflict of interest, such as a suspicion of favouritism or preferential treatment when making decisions on matters such as reward and benefits.
- 3.2 Section 6 sets out the expectations on staff around undertaking and/or disclosing intimate personal relationships which might give rise to a conflict of interest.
- 3.3 Staff should disclose any existing relationships or family connections to members of staff and/or existing UoB students.
- 3.4 Relationships with relevant organisations or businesses that work with Bristol SU could also lead to a conflict of interest and should be declared.
- 3.5 All declarations of personal relationships will be treated sensitively, considering issues of confidentiality.

4. Undertaking other roles

- 4.1 Members of staff may wish to undertake other roles (paid or unpaid) while working at Bristol SU. As these may constitute a conflict of interest, they should explore with their line manager, who may wish to discuss with the People Team.

- 4.2 Members of staff may wish to apply for roles (paid or unpaid) at external organisations or companies.
- 4.3 For roles at University of Bristol, or other Universities, **Table 1** sets out the potential conflict of interest in relation to roles as defined in Byelaw 8.

Table 1

Role	Permissible to undertake while a salaried member of staff at Bristol SU?	Rationale
Course representatives (unpaid)	Yes	• Localised role • Focused almost entirely on academic rigour and quality assurance.
Faculty Representatives (Paid)	No	• Levels of responsibility that would cause issues with these roles include: 1. acting within the bounds of each role and confidentiality. 2. risk to disruption of line management. 3. political leadership - risk with impartiality. 4. access to confidential information. 5. risks associated with the perception of issues being dealt with impartiality that cannot be easily managed (DSC Member only).
Chair of Student Council (unpaid)	No	
Student Community Organisers (paid)	No	
Democratic Standards Committee (DSC) Member (unpaid)	No	
School Representatives (unpaid)	To be considered on a case-by-case basis	• Bristol SU is bringing this role within our processes so each role will have its own context, and the potential conflicts of interest will need to be explored.

- 4.4 Members of staff may also undertake voluntary work or activity, such as for a charity. In these cases, this is unlikely to constitute a conflict of interest. Members of staff should explore with their line manager if there may be any potential conflicts of interest, and their line manager may wish to discuss with the People Team.

5. Gifts and Hospitality

- 5.1 Appropriate gifts and hospitality (given and received) to or from third parties, for the purposes of establishing or maintaining good business relationships or improving or maintaining our reputation or image are allowed.
- 5.2 To assess whether hospitality or gifts are appropriate, staff should ask themselves:
- a) Is there any obligation or expectation?
 - b) Is the gift/hospitality appropriate and its value reasonable?
 - c) Is it a usual gift/hospitality to give in this context?
 - d) Is the giving and receiving of the gift/hospitality being done openly?
 - e) And most importantly “Will the gift/hospitality influence my/my contact’s behaviour or decisions in any way?”
- 5.3 A reasonable value for a gift/hospitality is likely to be less than £20.

- 5.4 Inappropriate hospitality or gifts must be returned/refused; we suggest with a letter, referring to this policy.
- 5.5 Any gifts given from Bristol SU must be given in the SU's name, not appearing to come from the staff member.
- 5.6 Gifts must never be given to or received from government officials or representatives or politicians or political parties, however small their value.
- 5.7 Gifts of cash or cash equivalent (i.e. vouchers) should not be given to business contacts. (They may be given in other contexts where there can be no unfair business advantage, for example to students taking part in research projects.)
- 5.8 All gifts/hospitality received and sent must be disclosed and logged using [this form](#).
- 5.9 In certain circumstances it may be appropriate to receive reasonable hospitality from suppliers. This will be decided by the Chief Executive.
- 5.10 Failure to disclose gifts may constitute a disciplinary offence, which will be dealt with in line with our Staff - Conduct Policy.
- 5.11 If the undeclared gift was of significant value, and the recipient is in a position to influence dealings with the donor, the offence may be treated as gross misconduct

6. Introduction on approach to staff-student intimate personal relationships

- 6.1 Our policy on intimate personal relationships between staff and students is designed to set clear expectations around intimate personal relationships between students and staff, around professional boundaries, protect the interests of staff and students, and prevent conflicts of interest and/or abuse of power as part of our commitment to foster a safe environment for students.
- 6.2 Bristol SU exists to support our students. Working for the charity creates access to students and student data and by having a policy that prohibits intimate relationships between its staff and students, we can safeguard fairness, trust, and the integrity of its services. Such relationships can create real or perceived conflicts of interest, power imbalances, and risks of exploitation, where students may feel pressured or disadvantaged due to the authority or influence held by staff. The policy is necessary to protect students from harm, to ensure that the Student Union remains a safe and supportive environment, and to maintain confidence that decisions affecting students—whether relating to representation, welfare, or opportunities—are made impartially.
- 6.3 Our staff includes those employees on salaried or fixed term contracts, Full Time Officers, and students in staff roles. Full Time Officers are employed by Bristol SU on a salaried basis, and expectations around their disclosing intimate relationships with students during their period of office is set out in this policy.
- 6.4 The requirements of this policy are not applicable to Part Time Officers, who receive an honorarium for their duties of office, but are not contracted as employees.
- 6.5 This policy covers consensual relationships. Bristol SU does not tolerate any instances of harassment and sexual misconduct. This policy should be read in conjunction with our Staff Code of Conduct policy.

Staff-student relationships

- 6.6 Bristol SU:
 - a) Does not allow **senior salaried staff or responsible staff** to enter into intimate personal relationships with any University of Bristol students, including with Full Time Officers, given pastoral/professional/line management responsibilities.

- b) Does not allow **senior salaried staff or responsible staff** to take on or assume pastoral, advisory, or line management responsibility for a student with whom they are in an existing intimate personal relationship, or with whom they previously had such a relationship.
- c) Strongly discourages any relationship between **any Bristol SU staff member not included in the categories above and a student** which goes outside of professional boundaries given the inherent imbalance of power between staff and students. This includes between any Bristol SU staff member and a student, student staff member or student on work experience. Any such relationship must be declared formally to enable any potential for conflicts of interest or imbalance of power and authority to be managed, and this policy outlines the process steps for disclosing.
- d) **Senior salaried staff are those within the Management Group (Directors, CEO and Heads of Department).** Senior staff responsibilities include any professional, pastoral, line management or administrative responsibility for, or authority over, a student whether temporary or permanent. This includes but is not limited to:
 - Acting in a senior role which involves the setting or enacting of institutional policy or process in relation to education or student wellbeing.
 - Providing wellbeing or welfare support.
 - Providing ongoing regular contact or administrative/operational support related to a student's studies.
 - Delivering information, advice and guidance.
- e) **Responsible staff are those who undertake responsibilities directly involving students** that are defined as:
 - Line managing student staff.
 - Providing mentoring, delivering advice and guidance to students.
 - Holding 1:1 meetings with students.
 - Having repeated contact with particular students.
 - Having responsibilities for student training, learning and development.
 - Working or volunteering with a student group as a coach, instructor or skilled volunteer

6.7 The responsibilities listed at 6.6d and 6.6e are not intended to be exhaustive. The intent is that the policy covers any situation where the potential for conflict of interest and/or abuse of power may exist as a result of the formation of an intimate personal relationship. Where a member of staff is not sure they should seek advice from their line manager and/or the Director of People, Culture and Organisational Development.

6.8 Any failure to comply with this policy will be dealt with in accordance with the appropriate staff disciplinary procedures.

6.9 The intimate relationships policy comes into operation from 17 November 2025.

Scope

6.10 This policy applies to all University of Bristol students and staff at Bristol SU. A student is defined as any individual registered on a programme of study at the University, including summer school and short courses. Students may also be studying away from the University premises for part, or the whole, of their programme. This also includes students who have suspended their studies with the intention of returning.

6.11 A member of staff is defined as any individual either employed or engaged by Bristol SU on a paid or unpaid basis to carry out work for the SU under any type of employment contract. For the requirements of this policy, this includes agency workers, self-employed freelancers, sole traders and contractors and honorary appointments. It also includes coaches, instructors and skilled volunteers who work or volunteer with Bristol SU student groups. Paid or volunteer coaches, instructors and skilled volunteers who are not students are not permitted to enter into intimate relationships with students. For coaches, instructors and skilled volunteers who are also students, we strongly discourage intimate relationships with those students they work with. Coaches and instructors contracted by the University will be subject to University policies, which may differ from this policy.

6.12 Full Time Officers are employed by Bristol SU on a paid, salaried basis, and may also be current students who have suspended their studies with the intention of returning. We require Full Time Officers to disclose all of their intimate relationships (new and existing) with current University of Bristol students and staff throughout their term of office, in order that we can be aware of/manage any potential conflicts of interest and power dynamics during their period of office.

6.13 Student staff and Part Time Officers may already be within or enter into intimate personal relationships with students during their time working with the SU. We do not require student staff and Part Time Officers to disclose any intimate relationships.

Intimate personal relationships

6.14 An intimate personal relationship with a student includes:

- Any sexual or romantic relationship, including one-off occurrences, whether conducted in person, online or through any other form of communication.
- Any level of emotional intimacy which goes outside of the boundaries of professional conduct or could reasonably be seen to do so.

6.15 In relation to emotional intimacy, staff should be able to respond empathetically and with compassion to students in distress. However, this should not include:

- Any form of personal dependence, whether emotional, practical, financial or otherwise.
- Format, content or frequency of communications which go beyond what is necessary to carry out their role. Format could include (for example) frequent communications to students not related to SU business or visiting a student at their home.
- Favourable or exceptional treatment compared to any other student.

6.16 The list above is not intended to be exhaustive. If a member of staff is in doubt about these professional boundaries they should seek advice from the People Team.

7. Disclosure of relationships where staff do not have professional, pastoral, line management or administrative responsibilities

7.1 Even where a member of staff does not have professional, pastoral, line management or administrative responsibilities for students and is not defined as senior salaried staff or responsible staff, Bristol SU **strongly discourages** the formation of intimate personal relationships due to the inherent imbalance of power.

- 7.2 Where such a relationship develops, that both parties regard as consensual, **the member of staff must disclose this immediately** to the Director of People, Culture and Organisational Development (or the People Manager in their absence). Wherever possible advice should be sought in advance of a relationship being formed.
- 7.3 Members of staff should also disclose if someone they are already in a relationship with becomes a University of Bristol student.
- 7.4 Following a disclosure, the Director of People, Culture and Organisational Development, with any other relevant senior manager, will ensure that any necessary actions are taken to safeguard against any potential conflict of interest or abuse of power.
- 7.5 In some cases, a change of circumstances may mean that an existing relationship falls into the scope of prohibited relationships set out above – for example, a member of staff taking on a new role which means they take on pastoral/professional and or line management responsibility for the student. In these circumstances, it is the responsibility of the member of staff to highlight this change to ensure that appropriate mitigations can be put in place. Failure to do so will be considered as a potential misconduct issue under the appropriate policy.
- 7.6 Once a disclosure has been submitted by email to the Director of People, Culture and Organisational Development (or in their absence, the People Manager), the information will be considered to determine what mitigations need to be considered. In some circumstances, the disclosure may not require follow up action.

Relationships formed before 17 November 2025

- 7.7 Any intimate personal relationship between a member of staff and a current University of Bristol student (including Full Time Officers) formed before this new policy coming into force on 17 November 2025, which may be ongoing or have come to an end, may already have been declared to the People Team or a senior manager.
- 7.8 However, and regardless of whether a declaration has already been made, all existing intimate personal relationships, and relationships which have come to an end within the last 12 months involving a current student or current Full Time Officers, must be re-declared in accordance with the policy by 10 December 2025. Declarations should be submitted to the Director of People, Culture and Organisational Development by email.
- 7.9 Following a disclosure, the relevant senior manager will be notified and ensure that any necessary actions are in place to safeguard against any potential conflict of interest or abuse of power.
- 7.10 Where an intimate relationship ends it is expected that all parties will continue to conduct themselves in a professional manner and avoid personal disputes which impact on the working environment or other colleagues and students. It may also be appropriate for some of the actions, put in place by the SU during the relationship, to continue for a period of time following the end of the relationship. The staff members involved will be consulted and required to comply with reasonable actions.

Reporting concerns

- 7.11 Any member of staff with concerns about this policy or who become aware of a breach of the policy where a relationship that may not have been disclosed appropriately can seek advice from the Director of People, Culture and Organisational Development and in their absence, the People Manager.
- 7.12 If a relationship is identified that should have been disclosed but was not may be considered as a potential misconduct issue under the appropriate policy.
- 7.13 To safeguard against malicious or vexatious reporting, all concerns will be assessed carefully and confidentially to determine any appropriate action. Where a report is found to have been made deliberately with the intention of causing harm or misrepresenting the facts, this may be considered as a potential misconduct issue under the appropriate policy.

8 Declarations

- 8.1 Staff will be asked when starting in your role, to confirm in writing that you have read and understood this policy.
- 8.2 SMT declaration of interest forms are added to a Register of Interests which is on the agenda at every meeting.
- 8.3 It is the responsibility of each staff member to disclose a personal relationship, as set out in section 3, or a personal intimate relationship, as set out in section 6. Please speak to the Director of People, Culture and Organisational Development, or in their absence, the People Manager.
- 8.4 It is the responsibility of each staff member to disclose a conflict of interest. Please speak to either the Director of People, Culture and Organisational Development or Chief Executive.
- 8.5 Other staff members can also highlight if they feel a staff member is not declaring a conflict of interest. In these cases, please speak to either the Director of People, Culture and Organisational Development or Chief Executive.
- 8.6 Declarations of intimate personal relationships will need to be handled in a more sensitive manner and issues of confidentiality will be considered carefully. The Director of People, Culture and Organisational Development will advise on such matters.
- 8.7 If your personal circumstances and affiliations or connections change during your time as a staff member, you should initially speak to your line manager, who may refer to the People Team if necessary and update your information.
- 8.8 When deciding on such matters, consideration must be given to how things could appear to others and, in all cases, individuals should err on the side of caution, declaring an interest if there is any possibility that a conflict of interest may exist.
- 8.9 Any breach of this policy may lead to disciplinary action, which will be dealt with in accordance with the appropriate procedures.

9 Resources

- 9.1 Charity Commission: [Managing Conflicts of Interest in a Charity](#)

This policy does not form part of any employee's contract of employment, and it may be amended at any time. You will be notified of any changes to this policy by the relevant staff member and the most up to date version will always be on the intranet.