

EQUALITY IMPACT ASSESSMENT

Department	Registry/HR
Policy	Intimate Personal Relationships Policy 2025

1. Description of Policy

This policy supersedes the Ethics & Conduct Policy 2019. It has been developed in order to respond to the changing regulatory landscape and incorporate amendments to reflect the Office for Students (OfS), Condition E6 requirements relating to Harassment and Sexual Misconduct.

See: Condition E6: Harassment and sexual misconduct - Office for Students

The policy incorporates the key elements of the Academy's Ethics and Conduct Policy 2019 in relation to professional boundaries and the definition of personal relationships.

The policy is designed to be informative and accessible for staff and students. It recognises the valuable contribution of close professional relationships and collaborations between colleagues and between staff and students in the conservatoire environment. The policy outlines the requirements of disclosure and when preventative measures are required to ensure that professional boundaries are maintained in the context of staff-student and staff-staff intimate personal relationships.

The policy also outlines the methods for raising concerns as well as support for staff and students, which is responsive and flexible within different contexts and in consideration of the needs of the relevant individuals.

The policy is made available to staff and students via SharePoint and externally via the Academy's website at <https://www.ram.ac.uk/policies-and-procedures/harassment-and-sexual-misconduct>

2. Could the policy have an adverse impact on equality? Please consider this in relation to the following protected characteristics as defined by the Equality Act 2010:

- Age
- Disability
- Gender re-assignment
- Marriage or civil partnerships
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The policy is compliant with, and upholds, the principles of the Equality Act 2010 and will not have an adverse impact on equality.

However, it should be recognised that younger individuals and females may be disproportionately affected by power dynamic or imbalances within intimate personal relationships. It should also be recognised that individuals from LGBTQ+ communities may be wary, or fearful, of discrimination when disclosing an intimate relationship. Individuals of certain faiths may also be concerned that disclosure of a specific intimate personal relationship is contrary to, or even prohibited by, their religious or cultural belief.

3. Does this policy provide opportunities to make a positive impact on equality?

Yes, this policy is consistent with the OfS E6 Condition of Registration: Harassment and Sexual Misconduct in order to prevent and reduce unwanted behaviour that would undermine the principles of the Equality Act 2010.

The policy outlines advice and support for staff and students as well as recognising the impact that disclosures of an intimate personal relationships might have, by ensuring a confidential and sensitive process. It recognises and acknowledges the potential barriers that individuals may face in disclosure but aims to support staff and students to overcome these and prevent abuses of power connected to actual or perceived vulnerabilities related to protected characteristics.

The policy states:

- It is recognised that a disclosure may contain details that one or both parties do not wish to be made public and may be worried about potential consequences of the disclosure process, such as where it relates to a protected characteristic under the Equality Act 2010. Disclosures will be handled in a respectful manner, with dignity and considering the wishes of both parties as far as possible.
- An appropriate degree of confidentiality will be maintained throughout the process. It is anticipated that some limited information will need to be shared in the event that measures are required, for example with Heads of Department, line managers or for the purpose of safeguarding. This will be discussed with both parties and their opinions taken into consideration.

The policy ensures that individual personal circumstances are considered including the best interests and welfare of the student or staff member. Any vulnerabilities, related to protective characteristics, are considered carefully to ensure that the policy is responsive to the individual needs of those involved. The policy states:

- The Academy's Safeguarding Policy (Over-18s) outlines the expectations, responsibilities and procedures in relation to adults at risk and all staff must familiarise themselves with this policy.
- The Academy prohibits intimate personal relationships with adults at risk, which will lead to immediate disciplinary action. Staff in a position of trust are reminded that a sexual relationship with an adult at risk, particularly if suffering from certain mental disabilities, may fall within the scope of the Sexual Offences Act 2003.

The policy outlines, in detail, the support offered to those making disclosures of intimate personal relationships, and states:

- Disclosure of an intimate personal relationship between a staff member and student will be treated sensitively and students will be supported when raising questions and concerns in good faith. A student who would like advice can contact the Dean of Students or Senior Case Manager.
- Students who have experienced inappropriate contact or approaches from a staff member or non-consensual behaviour are encouraged to contact the Senior Case Manager. Allegations of staff misconduct will be investigated in line with the relevant disciplinary processes.
- The purpose of implementing preventative measures in relation to intimate personal relationships between colleagues or between staff and students is to remove or reduce the likelihood of potential or actual conflicts of interest and imbalances of power. Therefore, the following will be

considered during the review process (b) any known or disclosed risks of vulnerabilities relating to the staff member or student.

4. What evidence has been considered? What consultation has been undertaken?

The policy development and consultation process considered a wide range of information from higher education sector briefings and workshops, including those of the Office for Students, London Higher, Culture Shift, The 1752 Group, and other sector-wide discussion groups.

The Senior Case Manager consulted the Academy's Students' Union and student representatives, a core Academy working group (including the Dean of Students), and the Policy Review Group (including the Registrar and Director of Student Operations, Director of Finance, Director of HR and the Executive Assistant and Secretary to the Governing Body).

The Safeguarding Committee and Belonging Committee were kept informed during the policy development process. In addition, a Governing Body working group was convened in April 2025 to consider, and propose, an overarching strategic position in the context of the Academy community, and this has been incorporated into the policy content.

The Senior Case Manager has ensured that the policy is consistent with the provisions of the OfS E6 Conditions of Registration as well as the Equality Act 2010, and the policy has been reviewed by the EIA sub-committee.

5. What actions have been agreed as a result of this EIA?

The policy achieves its core purpose in outlining the Academy's position on the requirements of disclosure of intimate personal relations and when preventative measures are required to ensure that professional boundaries are maintained within such relationships.

Progress on the actions detailed below will be reported to the Belonging Committee.

Action	Timescale
Data Monitoring: collect anonymised data to identify trends and address any associated concerns related to protected characteristics (particularly those highlighted in the above assessment).	Annual reporting
Review support mechanisms provided to students and staff making disclosures of intimate personal relationships.	Ongoing

EIA approved by Belonging Committee: 4/11/2025