

Standard Operating Procedure for Personal Relationship Disclosures

Document name	Standard Operating Procedure for Personal Relationship Disclosures
Responsible Team	Human Resources
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1) Purpose

This Standard Operating Procedure (SOP) provides guidance to staff and students on how to declare personal relationships with staff members. It also outlines the responsibilities of Line managers, Heads of School/Department, and other designated individuals, referred to as Disclosure Managers, who are responsible for receiving and managing these declarations.

This SOP details the steps involved in making a declaration, what to expect after submission, and key considerations when reviewing declarations. It also sets out practical measures to mitigate real or potential conflicts of interest.

This SOP should be read in conjunction with the [Personal Relationships Policy](#).

2) Scope

As set out in the Personal Relationships Policy, declarations **must** be submitted under the following circumstances:

- **Pre-existing staff- student relationships:** If a staff member has direct responsibility for a student with whom they are in a personal relationship that predates the policy, or, is later assigned such responsibility, the staff member **must** and the student is also encouraged to disclose the relationship at the earliest opportunity.
- **Staff -to- Staff relationship:** While relationships between staff members are not prohibited, they may lead to real or potential conflicts of interest. Any such conflicts **must** be disclosed by both staff members at the earliest opportunity.

Where a staff member's personal relationship with another staff member creates a conflict of interest in a separate process unrelated to daily duties (such as during regrading or academic promotions), and this occurs as a one-time event, this SOP's declaration form requirement does not apply. However, staff members **must** disclose the potential conflict to the individuals overseeing the process to ensure transparency and proper management.

3) Process for disclosing

- **Staff members:** Complete Part 1 of the [declaration form](#) and submit it via the [MS Form](#) to their line manager, or if the direct line manager is involved in the relationship, to their line manager's manager. A copy of the submitted form will also be sent to HR for their records.
- **Students:** Complete Part 1 of the [declaration form](#) and submit it via the [MS Form](#) to their Head of School/Department, or if this individual is involved in the relationship, to the

relevant Faculty Pro-Vice Chancellor. A copy of the submitted form will also be sent to HR for their records.

Individuals making a disclosure will not be asked to provide details about the nature of their personal relationship. However, they will be required to identify the person they have a relationship with and outline any real or potential conflicts of interest to enable appropriate mitigation measures.

All disclosures will be handled confidentially and sensitively, with information shared only with relevant individuals managing the conflict.

4) Key considerations for handling declarations

Disclosure Managers must handle all declarations with discretion and care, recognising the sensitivity of the personal data involved.

Access to the information should be strictly limited to those with a legitimate need to know for the purpose of assessing and managing the conflict of interest and determining mitigation measures. This typically includes line managers and HR. There may sometimes be a need to reassign the declaration received.

HR will maintain a secure and confidential record of all declared personal relationships. This information will be processed in line with data protection regulations and used solely to support appropriate management oversight, mitigate conflicts of interest, and ensure a fair and transparent working environment. Access is limited to authorised HR personnel and data will be retained only as long as necessary for these purposes.

5) Meeting with the disclosing individual

After receiving a declaration, the Disclosure Manager must arrange a confidential meeting with the disclosing individual to:

- Discuss any real or potential impact of the relationship on the individual's responsibilities.
- Reassure the individual that the purpose of the declaration is to identify and apply appropriate mitigation, not to scrutinise their personal relationship.
- Focus discussions on practical measures rather than personal details.
- Confirm whether the other party has made a declaration and inform them of the need to do so if not.
- Explain that a discussion will be held with the other party's line manager or Head of School/Department, to ensure balanced decision making. If the other party's reporting line is unclear, it may be necessary to confirm who the other party's line manager, or Head of School/Department is before proceeding with these discussions.

6) Consulting with relevant managers

After the initial meeting, the Disclosure Manager should consult the line manager, or Head of School/Department of the other party involved. This consultation is strictly limited to identifying any real or potential conflicts of interest and developing appropriate mitigation measures.

When conducting these consultations, the Disclosure Manager must:

- Share only information that is absolutely necessary for conflict management purposes.
- Focus discussions on professional impacts rather than relationship details.
- Obtain consent where possible before sharing personal information with additional parties.
- Be particularly mindful of sensitive circumstances, including but not limited to same-sex relationships where individuals may not be publicly 'out'.
- Document who has been informed and the justification for information sharing.

The Disclosure Manager should inform the disclosing staff member about the planned consultation process, including who will be consulted and what information will be shared. While specific relationship details voluntarily disclosed by individuals may help in determining appropriate mitigations, such information should be treated with the utmost confidentiality and shared only with explicit consent.

7) Assessing mitigation options

Disclosure Managers in consultation with relevant managers, and where appropriate HR Business Partners, should consider a range of mitigation measures, tailored to the specific circumstances. These may be temporary or permanent measures and should be documented with clear review dates. Potential measures include:

- **Operational Changes:** Adjusting reporting lines, to ensure neither party has direct influence over aspects such as ADC reviews, expense approvals, workload allocation, or key academic elements such as research supervision.
- **Restrictions on Decision-Making:** Implementing safeguards to prevent individuals from making unilateral decisions affecting a person with whom they have a relationship. This includes recusal from approving course allocations, bursaries or scholarships, writing references, assessing work, or providing recommendations for career enhancement.
- **Independent Oversight:** Assigning an impartial third party to oversee key decisions related to recruitment, supervision, promotions, approvals and academic assessments. This may include adding panel members to committees and selection panels to enhance impartiality or establishing secondary sign-off requirements for decisions. Additionally, in circumstances where staff members involved in a personal relationship are the sole individuals responsible for managing another staff member or overseeing a student, it may be necessary to allocate an independent manager/supervisor/support.
- **Documentation and Transparency:** Establishing clear written protocols for how specific situations will be handled, with appropriate audit trails for sensitive decisions while maintaining appropriate confidentiality.
- **Regular Review:** Setting specific dates to review the effectiveness of mitigation measures, particularly for long-term relationships or evolving professional circumstances.

In exceptional circumstances where a staff member must retain some responsibility for an individual with whom they have a declared personal relationship (such as in highly specialised research areas with limited supervision options), the Disclosure Manager must:

1. Document the justification for this exception
2. Implement enhanced safeguards (e.g., co-supervision, external moderation)
3. Involve an HR Business Partner in the decision-making process
4. Establish more frequent review periods for the arrangement
5. Create clear escalation routes for all parties if concerns arise

All individuals aware of the relationship must maintain strict confidentiality in accordance with the data protection principles outlined in this SOP.

8) Informing the disclosing individual

Once mitigation measures are agreed, the Disclosure Manager should arrange a follow up meeting with the disclosing individual to:

- Communicate any necessary adjustments to their role or responsibilities in relation to the individuals.
- Provide clarity on implemented measures.
- Offer a written summary of agreed actions.

Disclosure Managers must complete Part 2 of the declaration form and submit it using the MS form link provided by HR via email. This information will be sent to HR and retained on the staff member's file. This documentation serves as a formal record of decisions made, helping to ensure clarity around expectations and outlining the necessary steps for effective management.

9) Review

Mitigation measures must be formally reviewed at least annually to ensure they remain appropriate, proportionate and effective. A scheduled review date should be documented when measures are initially implemented.

Disclosure Managers must complete Part 3 of the declaration form to document any changes to relationships and/or mitigation measures and submit it via the MS form.

The Disclosure Manager must also:

- Initiate additional reviews if circumstances change or if agreed measures prove ineffective.
- Document the outcome of each review, including any adjustments made.
- Consult with the disclosing parties during the review process.

The disclosing individual is responsible for proactively updating the Disclosure Manager of any relevant changes, such as:

- The end of a relationship
- The departure of one party from the University
- Changes in roles or reporting structures that may affect the conflict of interest
- Any issues arising from implemented mitigation measures.

When a relationship ends, the Disclosure Manager must reassess the situation, as conflicts of interest may persist after relationship termination. Following this assessment, the Disclosure Manager should determine whether:

1. Mitigation measures can be removed immediately.
2. Temporary measures should remain in place for a defined period.
3. Permanent measures should continue due to ongoing conflict risks.

For data protection compliance, declaration records should be managed as follows:

- Active declarations with ongoing mitigations should be retained for as long as the relationship continues and mitigation measures remain in place
- When a relationship ends or when mitigation measures are no longer necessary, declarations should be retained for a further 12 months and then securely destroyed, unless there are documented reasons for longer retention
- If one party leaves the University, the declaration should be reviewed within three months to determine if it remains necessary

The Disclosure Manager should ensure that all declaration records are stored securely with access restricted to those with a legitimate need.

The Disclosure Manager should proactively check with relevant parties six months after any significant change to determine if further actions are needed or if retention of records remains justified.

10) Further Support

It is recognised that managing disclosures requires sensitivity and a balanced approach to personal and professional considerations.

If additional support is needed, individuals are encouraged to seek guidance from their [HR Business Partner](#) at any stage of the process.