

Staff-Student Relationships Policy

Document

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| Document Name | Staff-Student Relationships Policy |
| Brief Description | <p>This document sets out the Navitas Group's policy on close personal or intimate relationships between Staff Members and Students for whom Staff Members have responsibility.</p> <p>This policy applies to all Navitas Group Staff Members globally and prohibits some types of staff-student relationships and requires disclosure of other types of student-staff relationships.</p> <p>This policy applies in addition to and does not override or relieve staff from obligations that apply under any other applicable divisional, college or university partner policies.</p> |
| Responsibility | Head of Group HR |
| Initial Issue Date | 18 February 2021 |

Version Control

| Date | Version Number | Summary of Changes | Reviewer Name and Department / Office |
|-------------|----------------|---|---|
| 18 Feb 2021 | 1.0 | Adoption by Board | Nerina Knight – Group HR Manager/Office of the CEO |
| 1 Sept 2024 | 2.0 | Update to professional and appropriate interactions and reporting procedures | Nerina Knight – Group HR Manager/Office of the CEO |
| 28 Aug 2025 | 2.1 | Update to reference newly developed Sexual Misconduct Prevention and Response Policy (and associated procedures) in the UK, and address new requirements in compliance with <i>Condition E6: Harassment and sexual misconduct</i> (see section of the Higher Education and Research Act (UK)) | Nerina Knight – Head of Group HR /Office of the CEO |

Related Documents

| Name | Location |
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| Environmental, Social and Governance Policy | Policy HUB |
| Values in Action – Our Code of Conduct | Policy HUB |
| Workplace Relationships Policy | Policy HUB |
| Privacy Policy | Policy HUB |
| Staff-Student Relationships Disclosure Form | Policy HUB |
| Sexual Misconduct Prevention and Response Policy – UPE (and associated procedures) | Policy HUB |

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1. Purpose and Scope

1.1. Purpose

The purpose of this policy is to establish rules for fair and consistent treatment, management and disclosure of close personal or intimate relationships and close family relationships between Staff Members and Students.

This policy is designed to provide a safe and productive educational environment for all Staff Members and Students; prevent conflicts; maintain a productive and trusting educational environment; and ensure confidence in the integrity and professionalism of Navitas Group Staff Members and the academic process.

In complying with this Policy, Staff Members must ensure they adhere to the requirements for professional interactions, outlined below, and apply sound judgement to ensure their actions to do not initiate, or create the perception of, a close personal or intimate relationship with Students for whom they have responsibility.

The Navitas Group regards the professional relationship between Staff Members and Students for whom they are responsible as central to the student's educational development and wellbeing. The Navitas Group does not approve or condone Staff Members pursuing or agreeing to close personal or intimate relationships with Students for whom they have responsibility. This is prohibited by this policy.

1.2. Scope

This Policy applies to all Navitas Group Staff Members globally. In this policy “Staff Member” includes Navitas Group employees globally including permanent, fixed-term, casual and sessional employees as well as contractors and consultants, whether in a corporate, teaching, examination support or any other position.

It applies to close personal or intimate relationships, and close family relationships, between a Student and any Staff Members who have responsibility for the Student.

This policy applies in addition to and does not override or relieve Staff Members from obligations that apply under any other applicable divisional, college, campus or university partner policies.

1.3. Terms used in this policy

In this policy:

- **“Responsibility for a Student”** is to be interpreted broadly to include any teaching, professional, pastoral or administrative responsibility, whether temporary or permanent. This includes but is not limited to lecturing, supervising, tutoring, mentoring, overseeing or advising on projects, work or laboratory experience, fieldwork, internships or vacation study placements, and the setting or marking of examinations or other assessments of any type. Responsibility for a Student will typically only cease when a Student has completed their entire program of study with Navitas (or formally withdrawn from it) and assessment results and relevant awards have been issued.
- **“Close personal or intimate relationships”** are to be interpreted to include relationships of an intimate, sexual, romantic or emotionally reliant nature, whether they are conducted in person or online and however brief, that extend beyond a professional or platonic relationship or friendship.
Note: The reference to emotional reliance should not prevent a Staff Member engaging compassionately and considerately with a Student on a professional basis, which may be particularly important when engaging with Students in distress.
- **“Close family relationships”** are to be interpreted to include the Staff Member’s spouse or defacto partner (each of any sex), the Staff Member’s and their spouse's children, grandchildren, parents, grandparents, nieces, nephews, aunts, uncles and first cousins, the spouse or defacto partner (each of any sex) of any such person and any other person who shares a household with the Staff Member.

2. Professional and appropriate interactions

All interactions and communications, whether online, by telephone or in person, between Staff Members and Students must be professional and appropriate in accordance with Navitas’ Values in Action - Our Code of Conduct.

Power imbalances are inherent in staff-student relationships. Therefore, free consent cannot be assumed on the part of the Student. Staff Members have an obligation to maintain and enforce professional boundaries and appropriate interactions at all times.

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By way of example the following situations are not regarded as professional or appropriate and must be avoided by Staff Members:

- meeting a Student alone at a private residence or isolated location;
- discussing your own personal or intimate matters with a Student;
- asking Students about their personal lives or intimate matters that extend beyond their role as a tutor or counsellor;
- engaging in exploitative or coercive conduct such as using positional power in order to gain a personal advantage by forcing a Student to do something or soliciting favours from a Student in exchange for more favourable treatment;
- borrowing or accepting money or other gifts from a Student for whom the Staff Member has responsibility, except for token gifts after all assessment is complete;
- behaviour of a threatening or criminal nature, or which reasonably makes the Student feel unsafe, including stalking, repeated attempts to impose unwanted communication or contact that is not the appropriate performance of your professional duties, harassment, assault, sexual assault or bullying;
- engaging in any behaviour that could be construed as 'grooming', which is predatory behaviour used to gain the trust and compliance of a Student, and to establish secrecy and silence to avoid disclosure of inappropriate behaviour; or
- engaging in any other conduct towards a Student which is unreasonable and unwelcome and could reasonably be expected to make the Student feel offended, humiliated or intimidated.

The requirements in this policy are not intended to prohibit Staff Members from discharging their professional or academic responsibilities within appropriate professional boundaries. For example:

- a Staff Member may necessarily have appropriate physical contact with a Student to the extent required to perform their academic role (e.g., modelling appropriate physiotherapy techniques); or
- a personal connection with a Student as part of their academic or professional role (e.g., as a personal tutor or as a counsellor).

Except in an emergency, interactions and communication outside of the Staff Member and their Student's standard class or learning activities and meetings should only take place either via a Navitas or College based email account, or a Navitas or College based learning or communication platform. Communication via chat or messaging apps such as WhatsApp should only occur if the relevant chat has been established by Navitas or the College. Sharing of personal contact telephone numbers or details for the purpose of Staff members interacting directly with their Students via text messages, private messaging or social media platforms or in non-Navitas or College supported forums must be avoided.

3. Close personal or intimate relationships

The Navitas Group strictly prohibits personal relationships of a close personal or intimate nature between any Staff Member and any Student for whom the Staff Member has responsibility or reasonably expects to have responsibility in future. Staff Members must not seek or agree to establish close personal or intimate relationships with Students for whom they have responsibility.

This prohibition is because the Navitas Group regards the professional relationship between Staff Members and Students for whom they are responsible as central to the Student's educational development and wellbeing. Close personal or intimate relationships can detract from this professional relationship and raise issues relating to conflicts of interest, inequalities of power in a relationship, actual or perceived favouritism and the undermining of trust in the academic process.

The following is an illustrative and non-exhaustive list of examples of detrimental treatment and favourable treatment of Students that may occur in the context of close personal relationships between relevant Staff Members and Students:

Examples of detrimental treatment

- not receiving a positive review or reference, or receiving a negative review or reference
- unfavourable treatment in academic assessments, for example, less access to support or feedback, less opportunity for extensions, lower grades or marks
- not receiving funding for research
- restricting access to resources

Examples of favourable treatment

- receiving a positive review or reference
- favourable treatment on academic assessments, for example greater access to support or feedback, more opportunity for extensions, higher grades or marks
- being promised access to funding and resources

- restricting participation in aspects of a student's education
- being promised introductions to others who could advance their academic or professional career

4. Disclosure Requirements

4.1. Close personal or intimate relationships

Any Staff Member who:

- is in a close personal or intimate relationship with an individual who has applied to enroll as a Student for whom the Staff Member would be responsible;
- is in a close personal or intimate relationship with an existing Student at the time of adoption of this policy; or
- develops a close personal or intimate relationship with a Student for whom the Staff Member is responsible notwithstanding the prohibition on such relationships in this policy,

must disclose the nature of that relationship to their divisional Human Resources representative as soon as possible so that appropriate arrangements can be made to prevent conflicts of interest. These arrangements, which may include those outlined in section 5 below, will typically result in changes to ensure that the Staff Member does not have responsibility for the relevant Student.

Attention is also drawn to the fact that relationships involving Students under the age of consent or vulnerable adults may constitute an offence under the laws applicable in the jurisdiction of the relevant Navitas Group college or institution.

4.2. Close family relationships

Staff Members must disclose any close family relationship with a Student for whom they have responsibility, or reasonably expect to have responsibility for in future, so that appropriate arrangements to prevent conflicts of interest can be made.

5. Measures to prevent or manage conflicts of interest

Navitas reserves the right to make appropriate arrangements in order to manage real or perceived conflict of interests between a Staff Member and Student. Such actions may include transfer of the Staff Member to another department, or in the case of teaching staff or a Student a transfer to another cohort. In these circumstances, Navitas may consult with both the Staff Member and Student to reach a satisfactory agreement regarding the transfer.

If, following consultation it is not possible to establish an appropriate outcome Navitas reserves the right to take prompt, appropriate and lawful action to the extent necessary to manage an actual conflict of interest concerning Staff Members and Students in a close or intimate personal relationship or close family relationship. Such actions may affect terms and conditions of the Staff Member's employment, including termination of employment.

6. Disclosure and reporting of staff-student relationships

A Staff Member who is required to disclose a close family relationship or a close personal or intimate relationship with a Student under this policy must notify their divisional Human Resources representative of that relationship as soon as possible and in any event within one week of the relationship commencing.

If a Staff Member does not feel comfortable discussing the nature of their relationship in person, they may disclose the information via email and using the Staff-Student Relationships Disclosure Form available on PolicyHUB.

The divisional Human Resources representative will then:

- record and keep the disclosed information in each Staff Members file or on a dedicated confidential relationship register; and
- notify the head of the relevant Navitas college or campus so that appropriate arrangements can be made to prevent conflicts of interest.

Disclosures made under this policy will be handled in a manner seeking to ensure that, so far as reasonably possible, there is no detriment to the Student involved.

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7. Reporting inappropriate behaviour

In the event a Student wishes to report inappropriate behaviour with respect to a Staff Member-Student relationship, or they have concerns with respect to a potential conflict of interest, Students should seek out the Student Welfare Director, Academic Director or other point of contact designated by the college/campus to respond to inappropriate behaviour in person or via email. If a Student does not feel comfortable discussing their concerns directly then they may report their concerns online via the [Donesafe Public Reporting Form](#) or [Whispli whistleblower platform](#). When disclosing a concern, Students may choose to identify themselves or remain anonymous.

In the event a Staff Member wishes to report inappropriate behaviour with respect to a Staff Member-Student relationship, or they have concerns with respect to a potential conflict of interest, the Staff Member should speak to their manager or a member of the Human Resources department.

If a Staff Member does not feel comfortable discussing their concerns directly then they may raise their concerns online via the [Donesafe Reporting Form](#), or anonymously via the [Donesafe Public Reporting Form](#) or [Whispli whistleblower platform](#).

Refer to the relevant *Reporting and response process for incidents of Sexual Misconduct or Harassment* for further information on appropriate reporting pathways and processes that will be utilised to investigate and respond to disclosures of inappropriate behaviour.

Health & Safety Reporting Link:



Whistleblower Platform Link:



8. Protection for Students from Retaliation

The health, safety and wellbeing of every Student at Navitas is of utmost importance. The Navitas Group will not penalise any Students for participating in a relationship with a Staff Member. In response to any reports of inappropriate behaviour, appropriate actions will be implemented to ensure that Students are protected from retaliation or unfair treatment.

9. Confidentiality

So far as possible and subject to the specific provisions of this policy, Navitas will preserve the confidentiality of the disclosed relationship and will ensure that the personal information of the involved Staff Member and Student will be treated respectfully and in accordance with applicable privacy laws.

It will usually be necessary for the divisional Human Resources representative to notify the head of the relevant Navitas college or campus so that appropriate arrangements can be made to prevent conflicts of interest.

10. Compliance

This policy must be included in Staff Member inductions who work with Students and made available to all Navitas Group employees via the Policy Hub.

Student-facing Staff Members are required to, as part of their onboarding and induction:

- read and understand the contents of this policy
- undertake an awareness course on appropriate professional boundaries with Students and the risk of harassment and sexual misconduct occurring within such relationships.

Any failure to comply with this policy or disclose a relationship as required by this policy may result in disciplinary action being taken against the Staff Member up to, and including, termination of employment or contractual engagement.

11. Definitions

Unless the contrary intention is expressed in this policy, the following words (when used in this policy) have the meaning set out below:

| Term | Definition |
|--|--|
| Staff Member | all Navitas Group employees globally including permanent, fixed-term, casual and sessional employees as well as contractors, consultants whether in a corporate, teaching, examination support or any other position. |
| Student | any person enrolled in a course in a college or campus owned, operated or managed by any member of the Navitas Group. For the avoidance of doubt, a Student will remain a Student until they have formally withdrawn their entire course and program or been issued their results and any applicable awards. |
| Responsibility for a Student | is to be interpreted broadly to include any teaching, professional, pastoral or administrative responsibility, whether temporary or permanent. This includes but is not limited to lecturing, supervising, tutoring, mentoring, overseeing or advising on projects, work or laboratory experience, fieldwork, internships or vacation study placements, and the setting or marking of examinations or other assessments of any type. Responsibility for a Student will only cease when a Student has completed their study with Navitas and assessment results and relevant awards have been issued. |
| Close family relationship | are to be interpreted to include the Staff Member's spouse or defacto partner (each of any sex), the Staff Member's and their spouse's children, grandchildren, parents, grandparents, nieces, nephews, aunts, uncles and first cousins, the spouse or defacto partner (each of any sex) of any such person and any other person who shares a household with the Staff Member. |
| Close personal or intimate relationship | are to be interpreted to include relationships of an intimate, sexual, romantic or emotionally reliant nature, whether they are conducted in person or online and however brief, that extend beyond a professional or platonic relationship or friendship. |
| Company | Marron Group Holdings Pty Ltd ACN 631 941 403 |
| Navitas Group | The Company and all of its subsidiaries |

12. Review

This policy is to be reviewed every two years by the Head of Group HR with any material changes to be recommended to the Board.