
1. Overview and Scope

- 1.1 The Eat That Frog Group (Eat That Frog CIC, The Learning Curve and ETF Spain) recognises that employees who work together may form personal friendships and, in some cases, close personal relationships. We do not, as a general rule, wish to interfere with such personal friendships and relationships. However, we must also ensure that employees continue to behave in an appropriate, professional and responsible manner at work and that they continue to fulfil their job duties both diligently and effectively. These rules are therefore aimed at striking a balance between your right to a private life and our right to protect our business interests.

2. Rules on Personal Relationships

- 2.1 The following rules apply to employees embarking on close personal relationships at work, whether the relationship is with a fellow worker, client, customer, supplier or contractor and whether it is with someone of the same sex or a different sex:
- 2.2 You must not allow your relationship to influence your conduct at work. Intimate behaviour during normal working hours or on company or client premises is prohibited. This includes holding hands, other close physical contact, discussions of a sexual nature or kissing.
- 2.3 If you embark on a relationship with another employee in your department, you should declare this to your line manager as soon as reasonably practicable and they will treat the information in strict confidence until you are ready to divulge your relationship to other colleagues.
- 2.4 If you are a manager and you embark on a relationship with a more junior colleague, you should declare this to your line manager and HR as soon as reasonably practicable and again they will treat the information in strict confidence until you are ready to divulge your relationship to other colleagues. (See also 2.10). This declaration is particularly important and time-critical if you are the line manager of the employee because of the risk of the junior employee being afforded more favourable treatment during your relationship, or less favourable treatment if the relationship subsequently breaks down, and/or the risk of there being a breach of confidentiality. In order to avoid a situation where you have managerial authority over a junior colleague with whom you are having a relationship, we reserve the right to elect to transfer one or both of you to a job

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in another department or team, either on a temporary basis or permanently and you accept that, at this stage, this may involve the existence of your relationship having to be divulged to other colleagues on a need-to-know basis. We will first consult with both of you to try and reach an amicable agreement on transfer. Alternatively, if reasonably practicable, we may change the reporting line so that the more junior colleague no longer reports directly to you, either on a temporary basis or permanently, and/or may ensure that you are no longer involved in any management decisions relating to the more junior colleague.

- 2.5 If you begin a relationship with a client, customer, supplier or contractor and this allows the potential for either you or them to abuse your or their level of authority or influence over the other or otherwise for there to be a conflict of interest, you must declare the relationship to your line manager as soon as reasonably practicable and they will treat the information in strict confidence until you are ready to divulge your relationship to other parties. (See also 2.10) In these circumstances, we reserve the right to elect to transfer you to a job in another department or team where you or they will not be able to exert undue influence over the other party, either on a temporary basis or permanently and you accept that, at this stage, this may involve the existence of your relationship having to be divulged to other colleagues on a need-to-know basis. We will first consult with you to try and reach an amicable agreement on transfer. Alternatively, if reasonably practicable, we may change the client, customer, supplier or contractor contact arrangements so that the client, customer, supplier or contractor deals instead with an alternative employee, either on a temporary basis or permanently.
- 2.6 Under the Sexual Offences Act 2003, it is illegal for an adult in a position of trust (such as, but not limited to, a teacher), to engage in a sexual relationship with someone under 18 who is in their care or education, even if the relationship is consensual. Generally, we advise against having a relationship with a customer due to safeguarding and conflict of interest concerns.
- 2.7 If a personal relationship (or the breakdown of a personal relationship) starts to affect your performance or conduct at work, then your line manager will speak to you with a view to your previous level of performance or conduct being restored. However, if your performance or conduct fails to improve or it reverts to a problem level, the matter will become a disciplinary one.
- 2.8 If you are having or have had a personal relationship and you are found to have afforded either more or less favourable treatment to the other employee because of this relationship or you have exercised undue influence over a client, customer,

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supplier or contractor or allowed them to exercise undue influence over you (for example, you have awarded contracts, granted special terms of business or otherwise treated them more favourably than would otherwise have been the case), this is a very serious disciplinary matter and could result in your summary dismissal for gross misconduct. A breach of any of these rules is a disciplinary offence and will be dealt with under our company disciplinary procedure. Depending on the seriousness of the offence, it may amount to gross misconduct and could result in your summary dismissal.

2.9 We will not refuse to recruit a job applicant on the ground that they are married to, or in a civil partnership or other close personal relationship with, an existing employee. We also do not place any prohibition on spouses, civil partners or partners working within the same department, but the rules set out above on personal relationships at work still apply.

2.10 In order to declare any conflicts of interest – please see the procedure in our “Conflict of Interest” policy

3. Administration of this policy

3.1 The HR department is responsible of the administration of this policy. If you have any feedback, please contact HR@eatthatfrog.ac.uk

3.2 This policy is reviewed annually.

3.3 Note: When saving the final draft of this document, ensure that you Ctrl+A to select all, then click F9 to update the contents and all links within the document.

Date	Version	Details of the change	Agreed by
May 2025	25.05	Formally the “Professional and Personal Relationships Policy” Moved to Enlighten HR template for “Personal Relationships at Work” Changes from Enlighten HR template: 2.4 – Changed from Director to “manager’s line manager and HR”	Board

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		2.5 – Changed from Director to line manager and added section on advice against relationships with customers and the law on this. 2.4 and 2.5 linked to 2.10 as conflicts of interest need to be declared and logged. 2.6 – New point advising against relationships with customers due to safeguarding and conflict of interest concerns in our sector. 2.10 – Added reference to Conflict of Interest Policy so that staff are reminded how to report these Changes from old policy: Old policy covered gifts – which is duplicated in the “Anti fraud, Bribery and Corruption” policy, confidentiality – which is covered in the “Staff Confidentiality” policy and conflicts of interest – which are covered in the “Conflict of interest” policy – so lots of duplication has been removed. Old policy appeared to have very specific examples, which are generalised by the other policies. E.g. covered not giving out personal mobile phone numbers, whereas the confidentiality policy instead has not giving out personal data, which therefore gives a better level of cover.	
Next review May 2026			