

SCOPE

This Policy applies to all Balfour Beatty people in the UK, including employees, apprentices, graduates, workers, contractors, volunteers and colleagues on work experience.

The policy is non-contractual, and we may change it at any time.

PURPOSE

We recognise that individuals who work together may have or may form personal relationships. All colleagues are entitled to a private life, and Balfour Beatty does not prohibit personal relationships in the workplace.

It is important nonetheless that all colleagues are aware of the potential issues that could arise from the existence of a personal relationship at work; and ensure that being in any such relationship does not interfere with their ability to work professionally; or on business delivery. This policy sets out guidelines for the management of personal relationships at work and for what is considered acceptable and what is not.

ABBREVIATIONS / DEFINITIONS

None	N/A
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INPUTS

Reference	Type	Title
HRS-PL-0005	Policy	Fair and Inclusive Workplace
HRS-PL-0008	Policy	Disciplinary Policy
ETH-PL-0104	Policy	Conflicts of Interest
Link		Cultural Framework
Link		Code of Ethics

OUTPUTS

Reference No.	Document Title	Responsibility	Retention Period
Link	Conflicts of Interest Register		

PROCEDURAL REQUIREMENTS

1. Our Principle

- 1.1 Our [Cultural Framework](#) sets out Balfour Beatty's values and ensures we operate in a workplace which will help us deliver Build to Last and create a great place to work. This policy helps ensure that we're Trusted to do the right thing in respect of the existence and formation of personal relationships in the workplace. It also helps ensure that we Value Everyone by having respect for all colleagues.
- 1.2 We expect colleagues to act with a high level of integrity to uphold the principles set out in this policy, the [Code of Ethics](#) and our inclusion and diversity commitments.

2. What is a Personal Relationship?

- 2.1 Balfour Beatty considers a personal relationship for the purposes of this policy to be:
 - Any **close personal relationship** – colleagues who are married, engaged, partners, dating, or engaged in an intimate or sexual relationship
 - Any **familial relationship** – colleagues who are related including by marriage (eg. in-laws)
 - Any personal relationship (close personal or familial) with an **external third party** (eg. subcontractor, supplier, client)
- 2.2 These definitions are not exhaustive. Given the varying nature of personal relationships, Balfour Beatty colleagues are required to exercise judgment in assessing whether a particular relationship they have in the workplace meets or could meet one of these definitions. If any colleague is unsure whether this policy applies to their circumstances, they should speak to their line manager or the HR or Ethics Team in confidence about their situation.

3. General Principles

Personal relationships at work must be conducted in accordance with these principles:

- The personal relationship (or any subsequent breakdown in the relationship) must not cause any detriment or disruption to business delivery and must not interfere with work
- Intimate behaviour between partners in a close personal relationship within the workplace is not permitted. Intimate behaviour includes but is not limited to actions such as kissing, holding hands, or other physical/sexual contact.
- Confidential information about the business or colleagues must not be shared between colleagues in a personal relationship.
- Colleagues should not use company equipment or resources in furtherance or initiation of a close personal relationship. This includes use of Teams, company phones and email.
- All colleagues, including managers and senior* leaders, should never give preferential treatment to colleagues or suppliers with whom they have a personal relationship. Preferential treatment includes but is not limited to: pay increases, promotions, transfers, enhancements to terms and conditions or benefits, protection from disciplinary sanction, priority for learning/development activity; and approving expenses outside of policy; and for personal relationships with third parties, could include bypassing tendering exercises, appointing subcontractors without due diligence, or relaxing payment terms for clients.
- Managers and senior leaders should never seek to exert influence over other managers managing someone with whom they have a personal relationship (for example, where a senior leader's partner works for another manager).
- Managers should not feel inhibited to manage their teams, if they are aware that one of their team is in a personal relationship with a senior leader or another manager. Balfour

Beatty commits to empowering managers to manage their team without fear of interference from other colleagues because of an existing personal relationship.

- The formation of close personal relationships where there is an imbalance in status between the partners (eg. a senior manager and an apprentice) are discouraged; please see section 'Embarking on a New Close Personal Relationship' section below, for more information.
- If colleagues are in a personal relationship at work that could amount to a conflict of interest, they must declare the relationship using the Conflicts of Interest register (see 'Personal Relationships Amounting to a Conflict of Interest' below).
- Within the functional areas of Payroll, Ethics, IT and Human Resources, colleagues may process and access personnel records of employees with whom they may be in familial or close personal relationships. These functional employees are expected to maintain the confidentiality of data and perform their duties to the highest ethical standards and respect to data privacy. You may be subject to disciplinary action up to dismissal if you fail to comply with this standard.

4. Personal Relationships Amounting to a Conflict of Interest

4.1 In some circumstances, the existence of a personal relationship at work can amount to a conflict of interest. In general terms, a conflict of interest is when a colleague's interests outside of Balfour Beatty create, or appear to create, a conflict between their personal benefit and Balfour Beatty operations.

4.2 For the purposes of this policy, a personal relationship at work will amount to a conflict of interest when:

- One person in the relationship has line management authority over the other person; or is involved in any decision relating to that other person's recruitment, promotion, pay, terms and conditions, transfer, disciplinary, grievance or anything to do with their employment. For example, the leader of a department or team whose partner works in that department or team; or manager whose relative reports into them. Both colleagues in a relationship of this kind must declare their relationship via the Conflicts of Interest Register .
- When a colleague has a personal relationship with an external third-party company such as a supplier, client or subcontractor and where the Balfour Beatty colleague has influence over appointment, payment or terms of engagement. This must be declared via the Conflicts of Interest Register .

4.3 You do not need to declare a conflict of interest if the relationship you are in does not meet the above definitions (for example, if you are dating a colleague at a completely different site, team or office), although you may still wish to inform your manager for reasons of transparency.

4.4 Colleagues who are Grade F and above are required to declare all current and historic personal relationships with current Balfour Beatty colleagues, even if they do not amount to a conflict of interest. Senior leaders are expected to lead by example and operate to the highest standards of integrity in respect of personal relationships in the workplace. Our Grade F and above colleagues have a greater span of influence and so an enhanced level of declaration is required.

4.5 If you are unsure whether a personal relationship at work amounts to a conflict of interest, you should discuss it in the first instance with your line manager if possible, if in doubt, it is better to declare it via the Conflict of Interest register.

5. Why do These Specific Circumstances Amount to a Conflict of Interest?

These specific personal relationships at work can be problematic as they may give rise to:

- Actual or perceived bias/favouritism – for example in relation to decisions around promotion, learning opportunities, pay, annual leave approval
- Independence of decision-making being called into question
- Actual or perceived inappropriate disclosure of business or sensitive information
- Actual or perceived unprofessional conduct
- Negative feeling or poor morale amongst other team members
- Feelings of exclusion amongst other team members
- Actual or perceived commercial risk – for example, that business decisions are being made on the basis of personal relationships/loyalties instead of commercial rationale
- Financial risk – for example, expenses outside of policy being approved
- Disruption to the team and workplace
- The merit of a person's appointment, transfer, or promotion unfairly being called into question, for example - 'they only got the promotion because their partner is the department leader'
- Legal risk – for example, future claims of unethical behaviour or appointment of a 3rd party supplier in breach of competition law
- Reputational damage for the company

6. Declaration Procedure

6.1 Relationships that amount to a conflict of interest must be declared by both parties in the [Conflicts of Interest Register](#) .

- Declarations will be reviewed by a member of the Ethics team. The relationship will be disclosed to the colleagues' line manager/s, and appropriate members of the HR team so as to administer mitigatory actions, if necessary. Declarations will be treated in confidence, subject to the above conditions. Managers are reminded to ensure confidentiality as the relationship may not be common knowledge, and details around personal relationships are covered by the GDPR.
- Upon receipt of a declaration, Balfour Beatty will implement immediate measures to minimise the risks associated with the conflict of interest. This may include delegating authority to another manager or re-assigning particular tasks.

6.2 In the case of a familial personal relationship or a close personal relationship, re-deployment of at least one of the parties to another team, department, SBU or group company will be prioritised. If the conflict of interest is considerable and there are no reasonable actions the company can take to minimise the risks, or if redeployment is not achieved within a reasonable timeframe post-declaration, then as a last resort Balfour Beatty may need to review the colleagues' continued employment.

6.3 Managers are expected to act with the highest integrity if they are in a personal relationship amounting to a conflict of interest, or if they are Grade F or above, by: a) declaring the relationship as a conflict of interest at the earliest opportunity b) not giving preferential treatment to the other party in the relationship and c) complying with any mitigatory measures.

7. Compliance

You may be subject to disciplinary action under the disciplinary procedure if:

- You do not declare a personal relationship of the kind described above that amounts to a conflict of interest; or if you are Grade F and above and do not declare any personal relationship as defined by this policy
- As a colleague within the functional areas of Payroll, HR, Ethics and IT, you breach data privacy/confidentiality standards in any way
- Any other breach of the general principles of this policy

8. Embarking on a New Close Personal Relationship in the Workplace

- 8.1 Colleagues must be very careful if they choose to embark on a close personal relationship with a work colleague, to ensure that their actions could not be taken as sexual harassment. Asking a colleague to go on dates or making other physical or sexual advances if not reciprocated could amount to sexual harassment.
- 8.2 In particular, colleagues are discouraged from entering into relationships where there is a clear and significant imbalance in status, for example a relationship between a senior manager and an apprentice; or a director and an administrator; or where one party has vulnerabilities.
- 8.3 Where there is an imbalance in status, questions could arise either at the time the relationship commences or afterwards, around how freely consent has been given by the more junior* person to enter into that relationship. They may have felt pressure to submit to advances by their senior colleague for fear of retribution or negative impact on their career if they refused. They may have felt unable to refuse. It is important to be aware of the different levels of power that exist between the senior and junior parties and therefore the appropriateness of embarking on a close personal relationship in these circumstances. It leaves the more senior party vulnerable to accusations of harassment, discrimination or unethical conduct if the advances were to be rejected or if the relationship falters in the future.
- 8.4 All colleagues must therefore pause and reflect before they decide to embark on a close personal relationship at work. Think about whether there is an imbalance of power; and the potential negative consequences of making an advance or establishing the relationship.

*For the purposes of this policy the terms 'senior' and 'junior' are meant as descriptors of status rather than age or age-group

9. Additional Information

- 9.1 Managers must contact Employee Relations Line Manager Support on 08443 262626 for further support with managing any issues arising from a breach of this policy.

All employees can access the Employee Assistance Programme run by CIC. This provides free and confidential information, support and counselling service. The telephone number is 0800 085 1376 and the website is <http://www.well-online.co.uk/>.

If you wish to provide feedback about this policy, please click [here](#).