



# Maintaining professional boundaries policy

## 1.0 Purpose and scope

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The purpose of this policy is to set out our approach to maintaining professional boundaries with customers and their visitors. It aims to ensure that clear professional boundaries are established that are appropriate, fair and consider the customer's best interests at all times.

This policy applies to all Notting Hill Genesis employees including bank workers and others who work with us including agency workers, volunteers, consultants, contractors and work experience students. Where we refer to "staff" in this policy, this includes all the above groups.

This policy should be read alongside the [code of conduct](#), which sets out the professional conduct we expect from all staff. Please refer to the [code of conduct](#) and [housing of staff policy](#) for further guidance.

Colleagues should always strive to follow our [Notting Hill Genesis charter](#) to ensure that we continue to foster good relationships with our residents.

## 2.0 A professional relationship with customers

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Staff are ambassadors for Notting Hill Genesis through their work and will only provide services to customers in the context of a professional relationship. Staff will behave appropriately and professionally at all times and will be personable but not make friends with customers.

Some customers may be keen to develop closer friendships with staff due to being isolated or lonely. We have a responsibility to manage this within the boundaries of our role. Similarly, a staff member may be keen to build a friendship with a customer. Allowing a relationship to develop beyond a professional one would be an abuse of our position. We should always use our professional judgement when considering the context of the situation to make sure that our actions do not overstep the boundaries of what is expected in our role and hold other colleagues accountable to this standard.

## 3.0 Approaching customers

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### 3.1 Appearance and dress

The way we present ourselves to a customer, including the way we dress, can influence the relationship we wish to build with them. The way we dress will be appropriate to the work we do and the customers we work with. Staff should check what they are wearing is appropriate with their manager if they are unsure. We will take into account cultural differences and health and safety risks associated with agreed activities. Staff will wear their identity cards at all times and always present them at their first meeting with a customer.

### **3.2 Language**

It is important that we use clear, appropriate language that the customer is comfortable using and finds accessible, both written and verbally. Where English is not a customer's first language, we will support them to find alternative ways of accessing written and verbal communications, such as through an [interpreter or translation services](#). If the customer requests any adjustments for communications, please see our Service Adjustment Policy for further information.

We will address customers depending on their preferences and may ask them to confirm what this is, for example during our visits or when we contact them through the phone.

### **3.3 Physical contact**

We will not initiate physical contact with a customer that could reasonably be seen as an assault or likely to result in physical harm or a threat of physical harm. Similarly, we will not make physical contact with a customer that could be perceived as sexual conduct or an intimate approach.

Refusing physical contact from customers may be difficult, particularly where customers are used to being physically affectionate with people. We will support customers to recognise the impact that their contact may have on other people, and their own safety, and draw up appropriate boundaries.

## **4.0 Maintaining professional relationships**

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### **4.1 Friendships and intimate relationships**

We will not use our job roles or positions to form new friendships or intimate relationships with customers. Any invitations will be politely declined. If this behaviour persists, staff should refer to the [unacceptable behaviour policy](#) for guidance.

We will always disclose any closely connected relationships as defined in the [code of conduct](#) and we will not give customers preferential treatment. We will always consider our professional relationships and conduct ourselves outside work in a way that will not adversely affect customers, colleagues or our wider organisation.

### **4.2 When current customers become employees**

If a customer becomes a volunteer or an employee, we recognise that this could sometimes cause conflicts of interest. Line managers should ensure that this is documented, managed and monitored as a declaration of interest in line with the [code of conduct](#).

### **4.3 Outside of work**

We operate across a large geographical area, as such, we recognise that it is likely that some staff members may come into contact with customers outside of work and their roles. We also recognise that staff may be both a Notting Hill Genesis resident and employee which means there is the likelihood of seeing other Notting Hill Genesis residents outside of work. See our [housing of staff policy](#) for more information on how to manage this.

### **4.4 Special relationships**

Although the needs of each customer will vary, we aim to treat all customers with the same level of respect and provide the same quality of service. We do not consider special relationships that are established solely in the context of providing services to

be appropriate. For example, it would not be appropriate for staff to agree to be a Power of Attorney for a customer.

#### **4.5 Socialising**

Staff should avoid making or agreeing to special arrangements to see customers outside of working hours unless this is necessary for professional reasons, such as part of an investigation into subletting.

Staff should not accept invitations from customers to events such as weddings or parties and should not bring or send customers gifts. Staff can attend customer funerals, where this is felt to be appropriate and with the permission of their line manager.

Where a close relationship with a customer is established incidentally to working at Notting Hill Genesis, this should be declared following the relevant HR procedures, such as the [code of conduct](#).

#### **4.6 Gifts and hospitality**

We do not normally accept gifts from our customers and will politely decline the offer and explain our policy. However, if the refusal is genuinely likely to offend the customer, then in exceptional circumstances we may accept small gifts and will declare the gift in accordance with our [code of conduct](#) and [anti-bribery policy](#).

Notting Hill Genesis as an organisation may also offer a gift to a customer as goodwill (see [compensation and goodwill gestures policy](#)). We will not give customers money to pay for items on their behalf, however, we will aim to cover reasonable additional expenses as compensation, for example, the cost of paying for electricity for plug-in heaters when a boiler has broken down. See our [compensation and goodwill gesture policy](#) for further information.

#### **4.7 Sharing personal information and experiences**

We will not share personal details with our customers, such as our own or another person's personal address or phone number. Sharing details of personal experiences can be helpful for a customer if there is a clear positive message, however, we will always be mindful when sharing experiences so that it does not undermine the professional relationship. It is more important that customers are supported to deal with their own experiences. If there is any doubt about sharing information, staff should approach their line manager beforehand for advice.

We should be using our professional curiosity to identify if residents are showing signs of potential or actual risk of harm. This involves communicating in the right way with the customer, recognising any signs to get a better understanding of their situation and asking questions where appropriate, rather than making assumptions or accepting things at face value. Please refer to our [safeguarding policies and procedures](#) if a safeguarding concern arises, or our [vulnerability policy](#) if the customer discloses a vulnerability that we have not already recorded.

#### **4.8 Social networking**

All social media contact with customers should be conducted in accordance with the [code of conduct](#) and [social media policy](#). Only designated spokespeople are permitted to communicate officially on behalf of Notting Hill Genesis.

#### **4.9 Beliefs and values**

We respect a customer's right to hold their own beliefs and opinions. If it is safe to do so, we will challenge these beliefs if they are discriminatory, where they conflict with the organisation's values or pose a risk to our customers and/or Notting Hill Genesis and its

employees (see [unacceptable behaviour policy](#)). We will not impose our personal beliefs or opinions relating to religion, politics, philosophy, ethics, culture or anything of similar nature. We respect customer's right to make their own choices and decisions and will support them in making informed choices.

#### **4.10 Power imbalance**

We must acknowledge the potential power imbalance between staff and residents. This imbalance can arise from many things, such as differences in protected characteristics, life experiences, or even the type of interaction such as a property inspection. Although we must always make sure that professional boundaries are maintained, we also want to create a safe environment where residents feel empowered to communicate freely with us, and that we are approachable. Therefore, it is important to consider how our actions can affect how residents may feel towards us and recognise that anyone's diverse life experiences can impact how they communicate and interact with us. This understanding should guide our approach to communication, helping us to find the right balance whilst respecting their boundaries.

## **5.0 Protected information**

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### **5.1 Accessing accounts**

As a general rule, staff will not handle or store a customer's money (debit cards, cash or PIN numbers) and will discuss any customer concerns with their line manager. However, some specific roles (such as within supported housing) may need to handle money in exceptional circumstances in line with our [managing customers' valuables and finances policy](#).

Staff will not log into online accounts owned by customers, such as bank accounts or email, record any passwords, passcodes, log-in details or account/PIN numbers.

If a colleague has concerns about a customer's ability to manage passwords or other security details and online accounts, they should discuss this with their line manager to see if there is any support that the customer could access or whether a referral could be made to social services for instance.

### **5.2 Countersigning documents and forms**

Staff will not countersign documents or forms such as passport applications. In addition, staff will not act as witnesses for customers, for example, being a witness to the signing of a contract.

## **6.0 Confidentiality and privacy**

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Where we support customers inside their homes, we will ask for permission before we enter their home and before entering any room. Where possible we will always provide written notice in advance if we require access.

### **6.1 Emergency access**

We only enter properties with explicit consent or, in the event of emergency, in line with our [no access policy](#).

### **6.2 Right to privacy**

We respect a customer's right to privacy and will not ask for private information unless we need it to deliver our services, or if the customer wishes to disclose

anything with us that would help deliver a better service for them. There may be situations where staff may be required to take pictures in a resident's home. For instance, when carrying out an annual visit or repairs inspection. We will always seek the resident's permission before doing so, however in extreme circumstances, such as with a safeguarding concern, we may not always seek permission if it is in the customer's best interest.

We will also follow our policies on data protection to ensure we correctly process, store, share and dispose of personal or sensitive information.

### **6.3 Supported housing services**

In our supported housing we have a responsibility for overseeing and responding to residents' wellbeing needs. This support is specific to the individual in line with our [wellbeing check policy](#).

## **7.0 Reporting poor conduct**

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Staff are encouraged to report any colleagues, concerns or breaches relating to professional boundaries to the appropriate line manager. These will be dealt with accordingly through our complaints, whistleblowing, disciplinary or safeguarding procedures.

In cases where poor conduct has or could have placed our customers or staff at risk (or made them feel threatened or uncomfortable) we may initiate disciplinary proceedings immediately. Our [disciplinary policy](#) provides more details about warnings, suspending and dismissing staff.

We will always report details of an incident to relevant external agencies where it is appropriate. We will also raise safeguarding concerns in accordance with our [safeguarding policies and procedures](#) as appropriate in order to protect customers and colleagues.

We will not take action against anyone making an allegation that subsequently turns out to be unfounded provided the report was made in good faith. We accept anonymous reports and process them according to our [whistleblowing policy](#).

We also encourage customers to report poor conduct or cases where they feel staff have broken agreements around their professional relationship. As far as possible, reports should be treated confidentially.

Where we identify poor conduct, we will support staff to develop and maintain professional boundaries in line with our HR policies.

## **8.0 Training for staff**

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We offer professional boundaries training to resident facing staff which includes guidance on how to communicate the importance of maintaining professional boundaries with customers.

## **9.0 Safety and risk management**

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If we encounter situations where it is difficult to maintain professional conduct with our customers, we will try to diffuse the situation and explain our approach to professional

boundaries. We will use our [unacceptable behaviour](#) and [visiting rules and warning alerts procedure](#) to ensure that customers can still access our services, at the same time as making it clear that we will not tolerate violent or aggressive behaviour towards our staff.

## 10.0 Reference

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Legislation, regulation and guidance:

- Code of Conduct Policy
- Housing of Staff Policy
- Social Media Policy
- Equal Opportunities and Diversity Policy Statement
- Data Protection Policy
- Anti-Bribery, Gifts and Hospitality Policy
- No Access Policy
- Managing customers valuables and finances policy
- Disciplinary Policy
- Whistleblowing Policy
- Bribery Act 2010
- Unacceptable Behavior Policy
- Compensation and Goodwill Gesture Policy
- Safeguarding Policy
- Vulnerability Policy

### Document control

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### Version Control

Date	Amendment	Version
4 November 2019	New NHG Policy	1.0
11 December 2019	Added statement in section 6 regarding asking residents permission before taking pictures	1.1
27 January 2025	Cyclical policy review. <ul style="list-style-type: none"> <li>• Specified who the policy applies to</li> <li>• Training for staff made clearer</li> </ul>	2.0

	<ul style="list-style-type: none"> <li>• Clarified supported housing processes</li> <li>• Link to compensation and goodwill policy in gifts and hospitality section, giving more examples</li> <li>• Accessing accounts section</li> <li>• Reference to domiciliary care roles removed</li> </ul>	
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