



Maintaining Professional Boundaries Policy

1.0 Purpose and scope

The purpose of this policy is to set out Notting Hill Genesis's (NHG) approach to maintaining professional boundaries with customers, and the family, friends, visitors and representatives of customers. It aims to ensure that clear professional boundaries are established that are appropriate, fair and consider the best interests of the customer at all times. A clear framework is set out for how we should and shouldn't behave when we deliver services to our customers.

This policy applies to all NHG employees including bank workers and others who work with us including agency workers, volunteers, consultants, contractors and work experience students.

This policy seeks to protect customers, staff and the organisation as a whole and complements the NHG Code of Conduct. The Code of Conduct sets out the professional conduct we expect from all staff at NHG.

The objectives of the policy are to:

- Outline what is and is not acceptable behaviour and the boundaries of relationships with customers
- Explain the nature and limit of support we can offer in certain circumstances
- Explain how we will manage breaches of this policy
- Support the NHG Code of Conduct to establish clear principles around staff conduct and probity
- Meet requirements set by our regulator.

We will not tolerate any kind of harassment, abusive behaviour, assault, threats, sexual advances or other unprofessional or improper behaviour from our staff members. This action will result in disciplinary action and may lead to criminal proceedings.

2.0 Definitions

Customer(s) – customer(s) refers to tenants, shared owners and leaseholders living in a property where NHG is the landlord or freeholder. It also refers to people who use NHG services such as renting commercial properties, floating support and personal care services within Care and Support.

In this policy references to customer(s) should be taken to also refer to their family members, friends, visitors and representatives of customers.

3.0 General Principles

There are some basic principles which are inherent in our work. We will always do the following:

- Be polite, punctual, reliable and open with our customers, colleagues and stakeholders
- Treat our customers with respect and act in a way that promotes and safeguards the wellbeing and interests of our customers, colleagues and organisation at all times
- Responsibly manage our relationships with customers
- Respect an individual's needs when defining the boundaries of each professional relationship
- Deliver a person centred service that is flexible and balances the needs, wishes and rights of a customer with any potential risks
- Ensure that customers understand the service and professional relationship we provide to them and give their informed consent to receive and engage in the service
- Assume that customers are able to make their own decisions or where capacity is limited a person acting as their power of attorney is able to do so
- For our Care and Support services, we will seek to understand customer's care and support needs using risk assessments, support plans and care plans as required

4.0 A Professional relationship with customers

Staff are ambassadors for NHG 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.

At the start of our professional relationship with a customer, we will agree the boundaries and set clear expectations about what to expect from the relationship. We will make sure they are appropriate to the customer's circumstances and preferences.

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.

4.1 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. 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.

4.2 Language

It is important that we use clear, appropriate language that the customer is comfortable using and finds accessible, both written and verbally.

We will use respectful language, not swear or use derogatory language about people, including other customers and colleagues. 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. This reflects our ongoing commitment towards diversity and inclusion.

We will also ask customers how they would like us to address them during our visits or when we contact them through the phone, letter or email.

4.3 Physical contact

We will not have 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.

Where physical contact may form a necessary part of our services, such as domiciliary care, that contact must be appropriate to the support we provide and identified in the care package and agreed with the customer beforehand, in accordance with their preferences and needs.

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.

4.4 Friendships and intimate relationships

NHG operates across many different tenure types and a large geographical area, as such, it is inevitable that some staff members may come into contact with customers outside of work and their roles.

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 consider our professional relationships at all times and conduct ourselves outside work in a way that will not adversely affect customers, colleagues or NHG.

We will not use our job roles or positions at NHG to form new friendships or intimate relationships with customers. Any invitations should be politely declined.

4.5 When current customers become employees

If a customer of NHG becomes a volunteer or an employee, we recognise that this could sometimes cause conflicts of interests. Line managers should ensure that this is documented and monitored as a declaration of interest in line with the Code of Conduct. Please refer to the Code of Conduct and Housing of Staff policy for further guidance.

4.6 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, the appropriate line manager should always be contacted beforehand for advice.

4.7 Social networking

All social media contact with customers should be done in accordance with the Code of Conduct and Social Media Policy. Only designated spokespeople are permitted to communicate officially on behalf of NHG.

4.8 Beliefs and values

We respect a customer's right to hold their own beliefs and opinions and accept that they may be different to our own. We will challenge these beliefs if they are of a discriminatory nature, where they conflict with the organisation's values or pose a risk to our customers and/or NHG and its employees. We will not impose our personal beliefs or opinions which may relate to religion, politics, philosophy, ethics, culture or anything else. We respect a customer's right to make their own choices and decisions and will support them to make informed choices.

4.9 Handling customers money and possessions

Staff will not handle or store customer's money (debit cards, cash or PIN numbers) and will discuss any customer concerns with their line manager.

For Care and Support services, the exception to this is where a member of staff is authorised to handle or access money under the Managing customers valuables and finances policy.

Loans or gifts of money will not be made to customers. Staff will discuss with their line manager those customers experiencing financial difficulty on more immediate assistance that could be provided.

Staff should never accept or borrow money from a customer. This could be seen as a bribe under the Bribery Act 2010, which is explained in more detail in the Code of Conduct policy.

Staff should never agree to look after a customer's belongings nor act in a way to financially benefit themselves at the expense of a customer. For instance staff should not agree to access or look after a customer's property whilst they are on holiday nor agree to feed their pets while they are away (e.g. in hospital). Staff must not use customer's money to purchase materials/equipment needed for work or use

customer's money/allow customers to buy them any personal items (e.g. buy refreshments/lunch for you when you are accompanying them to an appointment).

4.10 Customer accounts, forms and correspondence

Staff will not log into accounts owned by customers, e.g. council tax, bank accounts or email, record any passwords, pass-codes, log-in details or account/PIN numbers.

If a staff member 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.

4.11 Countersigning customer documents and forms

Staff should not counter sign customer documents and forms such as passport applications or any other documents including legal ones. If a customer asks a member of staff to do so this should be declined. In addition staff should not act as witnesses for customers for instance being a witness to the signing of a contract.

4.12 Special relationships

Although the needs of each customer will vary, staff should aim to treat all customers with the same level of respect and provide the same quality of service.

NHG 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 care staff in an extra care scheme to agree to be a Power of Attorney for a customer where there is no dual relationship.

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 dual relationship with a customer is established incidentally to NHG this should be declared following the relevant HR procedures.

5.0 Gifts and hospitality

We do not normally accept gifts from our customers and will politely decline the offer and explain our policy. However, if 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 the NHG Code of Conduct and the Anti-bribery, gifts and hospitality Policy.

6.0 Confidentiality and Privacy

We respect a customer's right to privacy and will not ask for private information unless we need it to deliver our services. We will treat information about our customers with respect and follow our procedures on confidentiality to process the information appropriately.

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.

We will also follow our policies on data protection to ensure we correctly process, store, share and dispose of personal or sensitive information. We will avoid discussing confidential issues in open areas unless we can ensure it is private. We will apply the same principles about personal and sensitive information about colleagues and volunteers.

6.1 Emergency access

Where we support customers in 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. The exception to this is in emergency situations or to meet our legal obligations. This may include conducting a legally required gas safety inspection: in such instances we reserve the right to enter a property without prior consent where we have not able to obtain this.

NHG considers an emergency to be a situation where we identify a risk so severe that it can't wait until we get an injunction as delay would result in significant damage to people or property. If the emergency situation is concern for the safety or wellbeing of the resident, we inform the police and invite them to attend when forcing access to a property. Staff should refer to the No access policy for further information.

6.2 Care & Support services

There may be occasions where Care and Support services are not able to gain the consent before entering a customer's room, for instance to complete wellbeing checks in the middle of the night. In these instances we will seek agreement for us to simply enter so as to disturb sleep as little as possible.

7.0 Reporting poor conduct

We 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, HR 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 staff.

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 will 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. All reports will be treated confidentially.

8.0 Training for staff

We will offer professional boundaries training which includes guidance on how to communicate the importance of professional boundaries with customers. This is a mandatory training in some of our services. Where we identify poor conduct, we will support staff to develop and maintain professional boundaries in line with our HR policies. We will put measures in place such as focussed training and mentoring to provide staff with the knowledge and awareness to improve their conduct.

9.0 Safety and Risk management

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 utilise our unacceptable behaviour and visiting rules and warning alerts procedure to ensure that customers can still access NHG services, whilst at the same time making it clear that we will not tolerate violent or aggressive behaviour towards our staff.

10.0 Our Approach

In writing this policy we have carried out assessments to ensure that we are considering:

- Equality, Diversity & Inclusion
- Privacy & Data Protection

To request a copy please contact us on policy@nhg.org.uk or for further information on our commitment to equality and diversity at Notting Hill Genesis please visit our website.

11.0 Reference

Legislation, regulation and guidance

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

Document control

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4 November 2019	New NHG policy	1.0
11 December 2019	Added state in section 6 regarding asking resident permission before taking pictures	1.1