

# Maintaining Professional Boundaries Policy

Originator:	Regulatory Compliance Team
Executive Management Team Approval Date:	March 2025
Review date:	March 2028

<b>1</b>	<b>Introduction</b>
1.1	The purpose of the Maintaining Professional Boundaries Policy is to ensure employees of One Vision Housing (OVH) establish and maintain professional practice and boundaries with customers, colleagues and other professional agencies.
1.2	The application of this Policy ensures compliance with the outcomes of the Regulatory Framework for Social Housing in England as outlined below: <ul style="list-style-type: none"> <li>• Registered providers shall: <ul style="list-style-type: none"> <li>○ Registered providers must ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants</li> <li>○ Registered providers must ensure that landlord services are accessible, and that the accessibility is publicised to tenants. This includes supporting tenants and prospective tenants to use online landlord services if required</li> <li>○ Registered providers must treat tenants and prospective tenants with fairness and respect</li> </ul> </li> </ul>
1.3	The Policy also assists OVH in meeting compliance with the relevant legislation / regulations in safeguarding adults and children.
1.4	<b>Access and Communication</b>
1.4.1	OVH is committed to ensuring that its services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for it or use its services.
1.4.2	Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date
1.5	<b>Equality, Diversity and Human Rights</b>
1.5.1	OVH is committed to fairness and equality for all customers, colleagues, and stakeholders.

1.5.2	OVH’s approach to Equality, Diversity, and Inclusion (EDI) goes beyond legal or statutory obligations, however, OVH will meet or exceed its legal requirements as outlined in the Equality Act 2010 and the Human Rights Act 1998. This policy also demonstrates how OVH will meet the requirements of Public Sector Equality Duties, which it has chosen to adopt and implement as a matter of good practice rather than as a legal obligation.
1.5.3	OVH is fully committed to eliminating unfair and unlawful discrimination. Hate Crime, Harassment, and Bullying will also not be tolerated, and take proactive steps to prevent such behaviours.
1.5.4	<p>It is unlawful to discriminate directly or indirectly based on the following protected characteristics:</p> <ul style="list-style-type: none"> <li>• Disability</li> <li>• Gender</li> <li>• Gender identity, or gender reassignment status</li> <li>• Race, racial group, ethnic or national origin, or nationality</li> <li>• Religion or belief</li> <li>• Sexual orientation</li> <li>• Age</li> <li>• Marriage or civil partnership status</li> <li>• Pregnancy or maternity</li> </ul>
1.5.5	OVH are also committed to ensuring that individuals are not treated less favourably due to their social, economic, or cultural backgrounds, as well as specific medical conditions as defined in the Equality Act.
1.5.6	OVH regularly review policies and practices to ensure they reflect its commitment to equality and diversity.
1.6	<p>The Policy should be read in conjunction with the following:</p> <ul style="list-style-type: none"> <li>• OVH Fair Access and Exit Policy</li> <li>• OVH Safeguarding Adults Policy</li> <li>• OVH Safeguarding Children Policy</li> <li>• OVH Gifts, Hospitality and Charitable Giving Policy</li> <li>• OVH Rent Payment and Arrears Recovery Policy</li> <li>• OVH Information Management Policy</li> <li>• OVH Disciplinary Policy</li> <li>• OVH Vulnerable Persons and Reasonable Adjustments Policy</li> <li>• OVH Equality, Diversity and Inclusion Policy</li> </ul>

<b>2</b>	<b>Statement of Intent</b>
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2.1	The Policy and procedures apply to all OVH employees including all permanent, temporary, part-time, agency employees and others including volunteers and apprentices. Contractors and sub-contractors employed by OVH will have Policies or guidelines that compliment this document.
2.2	For the purpose of this Policy a customer is defined as follows:

2.3	<ul style="list-style-type: none"> <li>• Anyone with potential to receive services from OVH (e.g. applicants for housing), those currently in receipt of services and those that are no longer in receipt of services but where a contractual relationship still exists, or is implied (e.g. former tenants)</li> </ul> <p>In operating this Policy, OVH endeavours to ensure the following principles are upheld in maintaining professional boundaries:</p> <ul style="list-style-type: none"> <li>• Treating people with respect and dignity</li> <li>• Providing excellent customer service</li> <li>• Acting with professionalism at all times</li> </ul>
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<b>3</b>	<b>Policy</b>
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3.1	OVH is committed to ensuring that professional boundaries are maintained across the organisation at all times.
3.1.1	OVH have developed and introduced a Code of Behaviour for our employees. The Code defines the principles of professionalism which we expect our staff to adhere to. The Code states that professionalism and excellent customer service is at the centre of everything that we do.
3.1.2	It is vitally important that the service OVH offers is professional and that employees do not offer a more favourable service to some customers than to others. For example, employees should not do 'favours' for customers and they should not accept hospitality or gifts in line with OVH Staff handbook and the 'OVH Gifts, Hospitality and Charitable Giving Policy'.
3.1.3	Breaching boundaries may result in a service that is discriminatory, inequitable and unprofessional and could be subject of disciplinary procedures.
3.2	<b>Maintaining Professional Boundaries for all OVH Employees (customers)</b>
3.2.1	In order to provide consistent and high-quality service, OVH operates clear guidelines for all employees that interact with customers to ensure they work within acceptable professional boundaries as stated below:
3.2.2	Employees should strive to offer a flexible approach and not just one way of working with customers i.e. service delivery should be tailored according to individual needs.
3.2.3	Flexible ways of working should still be within a framework of professional boundaries and the range of flexibility should be discussed at team level to ensure consistency as far as possible.
3.2.4	Employees should be approachable, open to fair challenge or criticism and not intimidating or inaccessible. Customers must not be discouraged from appropriately accessing support from external agencies.

3.2.5	Employees must respect customers' right to privacy and confidentiality and be sensitive to different personal and cultural needs. This includes full compliance with all data protection requirements, at all times.
3.2.6	Employees should not comment on or criticise the values of customers. Employees should always be careful not to prejudice, label or stereotype individual customers or customers with a particular need or range of needs.
3.2.7	Employees should be careful not to present themselves as superior in any way, including morally. It is important customers are not made to feel that they are inferior to staff or other customers because of their lifestyle, life quality, choices or support needs.
3.2.8	At all times professional relationships should be stressed and maintained. Customers should not feel in any way indebted to staff, or that they are recipients of charity. It should always be appreciated that employees are paid to carry out their duties and overt gratitude from customers should be discouraged and the reasons for this explained.
3.2.9	Generally, advice should only be given at the request of the customer. If the employee is concerned about some behaviour or activity of the customer on which advice has not been sought (e.g. a potentially exploitative relationship, or situation where there is the potential for physical danger) they should offer their concerns and advice in a non-judgemental way.
3.2.10	In such cases employees should advise their line manager if there are concerns of this nature as this may involve safeguarding issues (see OVH Safeguarding Policies for further details).
3.2.11	<p>Employees should endeavour to keep relationships with customers professional at all times. All employees should make their line manager aware of any personal connections that may already exist or develop with customers at the earliest opportunity. Examples include, but are not exhaustive of:</p> <ul style="list-style-type: none"> <li>• Employees who are customers themselves and receive services from OVH</li> <li>• Employees who may have relatives / close friends that are OVH customers</li> <li>• Employees with an existing relationship or who develop a relationship with an OVH customer</li> </ul>
3.2.12	Where this occurs the employee should update records accordingly in the 'MyPlace' system and should inform their line manager at the earliest opportunity.
3.2.13	<p>Where employees do have personal connections with an OVH customer or potential customer, they must endeavour as far as is possible to distance themselves from any normal customer interactions. Non exhaustive examples include</p> <ul style="list-style-type: none"> <li>• Not being involved in any part of the process for assessment for or allocation of services (e.g. housing applications or pre-tenancy needs assessments)</li> <li>• Direct provision of services (e.g. as a Neighbourhood Officer or Independent Living Officer)</li> <li>• Decisions to provide services to the individual(s) they have the personal connections with (e.g. investment decisions or programming)</li> <li>• Decisions to award contracts or any kind of financial transaction</li> <li>• Accessing / altering personal information held about the individual(s) with whom they have the personal connection or making this information available to them / others</li> </ul>

outside of data protection protocols or the conditions outlined in the OVH Information Management Policy

3.2.14 If it is not possible for any reason for the employee to maintain this level of distance from service provision and the individual(s) they have the connections with, they should inform their line manager and endeavour to keep them informed of any potential conflict of interest.

### 3.3 **Maintaining Professional Boundaries in the Independent Living Service (customers)**

3.3.1 In addition to the guidelines set out above (section 3.2), employees working in OVH's Independent Living services must also observe specific guiding principles as stated below.

3.3.2 Where Independent Living housing services are provided, customers should be offered choice and expressions of individual culture, and this should be encouraged and respected.

3.3.3 The ability to choose should be part of a general empowering approach that encourages personal development. Employees should be careful not to influence customers with their own beliefs. They should also be aware that their position has the potential to have a powerful influence when working with vulnerable and/or impressionable customers.

3.3.4 Customers who are living in an Independent Living property must, wherever possible, be involved in all decisions which impact on them directly. Each customer must be fully involved in the writing of and reviewing their Housing Action Plan and employees that have a personal connection with the customer should not be directly involved in this process.

3.3.5 Customers also have a right to refuse support, or not to take advice, provided that they abide with the terms of their tenancy and / or Independent Living agreements.

3.3.6 Where customers request help on their financial affairs, OVH will signpost or make a referral to appropriate agencies whilst respecting their privacy and confidentiality in line with its policies and procedures and subject to specific consent being obtained. Employees must not, however, handle customers' money, bank cards or bank statements at any time.

3.3.7 Where an independent living customer wishes to come off the service, OVH will follow its procedures as stated in the OVH Fair Access and Exit Policy.

### 3.4 **Maintaining professional boundaries (internal and external business interactions)**

3.4.1 The principles outlined in 2.3 above apply equally to customers and to employee interactions both with internal colleagues (OVH and wider Sovini Group) and in working relations with those outside of the organisation.

3.4.2 As per the 'Declaration of Interest' procedures, all employees should declare any known personal connections that could potentially bring the organisation into disrepute in dealings with external agencies, private businesses and during business transactions that OVH undertakes or intends to undertake.

<b>4</b>	<b>Implementation</b>
4.1	OVH employees will be reminded of the importance in maintaining professional boundaries during the induction process, during one-to-one supervision, in team meetings and the attitudes / behaviours needed to apply them.
4.2	Employees should be mindful that behaviour that is acceptable to certain individuals may not be acceptable to others, and they should deploy professional judgement at all times.
4.3	If a line manager witnesses or is made aware of a breach of professional boundaries by employees they manage, they will in the first instance offer support and guidance on amending behaviours.
4.4	If, after investigation, the breach of professional boundaries is severe or persistent it may be classed as misconduct and would be dealt with via the OVH Disciplinary Policy and procedures.
4.5	All employees have a responsibility to maintain professional boundaries with OVH colleagues, wider Sovini Group employees and other professionals outside of the organisation they interact with during the course of their work.
4.6	If an employer believes there is a breach of these professional boundaries in any way with fellow professionals, they should raise the matter with their direct line manager or the next level of management / the People and Learning Team if the line manager is thought to be responsible.
4.7	Each case will be taken seriously, and an appropriate course of action will be determined after investigation. In these instances, employees are advised to keep written records of the perceived breach or breaches to aid the investigation process.
<b>5</b>	<b>Performance</b>
5.1	There are no additional performance measures as a result of the operation of this Policy.
<b>6</b>	<b>Consultation</b>
6.1	All OVH staff and customer representatives have been consulted in the development of this Policy.
<b>7</b>	<b>Review</b>
7.1	The Policy will be reviewed every three years from the date of Executive Management Team (EMT) approval to ensure its continued suitability, adequacy and effectiveness, or as required by the introduction of new legislation or regulations impacting on professional boundaries or as result of any system audit findings.

<b>8</b>				<b>Equality Impact Assessment</b>			
8.1		Was a full Equality Impact Assessment (EIA) required?		No			
8.2		When was EIA conducted and by who?		An Equality Impact Assessment Relevance test was completed by the Strategic Regulatory Compliance Manager and the Policy and Strategy Administrator in February 2025.			
8.3		Results of EIA		The EIA did not reveal any differential impact on any of the protected characteristics. However, it was noted that service managers are required to ensure consistent delivery of the provisions of the Policy across all service areas.			
<b>9</b>				<b>Scheme of Delegation</b>			
9.1		Responsible committee for approving and monitoring implementation of the policy and any amendments to it		EMT			
9.2		Responsible officer for formulating policy and reporting to committee on its effective implementation		Director of Housing and Customer Services			
9.3		Responsible officer for formulating, reviewing and monitoring implementation of procedures		Director of Housing and Customer Services			
<b>10</b>				<b>Amendment Log</b>			
Date of revision:		Reason for revision:		Consultation record:		Record of amendments:	
16 October 2018		In Line with the review schedule		See section 6		<ul style="list-style-type: none"> <li>The Policy has been divided into two sections i.e. Section '3.2'- covering all OVH employees and '3.3'-covering staff working in Independent Living services</li> <li>The whole Policy has been reviewed in line with the current OVH business practices</li> </ul>	
18 <sup>th</sup> May 2021		Policy amended in line with change in business practice		See section 6		<ul style="list-style-type: none"> <li>Policy updated throughout to reflect current operational practice</li> </ul>	

			<ul style="list-style-type: none"> <li>• Inclusion of responsibilities for maintaining professional boundaries (internal and external business interactions) at 3.4</li> </ul>
18 <sup>th</sup> March 2025	In Line with the review schedule	See section 6	<ul style="list-style-type: none"> <li>• Team names updated throughout</li> <li>• Clause added at 3.1.1 following the development and introduction of OVH's Code of Behaviour</li> <li>• Additional Policies added at clause 1.6</li> <li>• Equality, Diversity and Human Rights Statement updated</li> <li>• EIA information updated at section 8</li> </ul>