



Professional Boundaries Policy

*Our mission is to provide innovative,
responsive and quality community services
through our commitment to Freedom,
Social Justice and Growth for all people.*

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SECTION 1 - INTRODUCTION

POSITION STATEMENT

FSG Australia (FSGA) staff have a responsibility to provide a safe and effective service. Whilst it is recognised that staff must establish a rapport with clients, and provide friendly and accessible services, they are responsible for establishing and maintaining appropriate boundaries between them and clients and for providing an equitable service. There is no single all-encompassing definition of what constitutes professional boundaries. The intention of this policy is to achieve a shared understanding of acceptable and unacceptable practice, enabling FSGA to apply clear and consistent standards.

SCOPE

This policy relates to all FSGA staff, with the exception of those who are working within the:

- Intentional Peer Support (IPS) model; these staff should disregard the professional boundaries policy and should instead refer to the personal limits described in the [IPS worker manual](#)
- Kaia program; these staff should refer to the [Kaia Program practice manual](#).

There are some events and arrangements planned with clients that are highly valued by them but may present potential boundary issues. In these instances there may at times be a need to exercise flexibility and discretion in the interpretation of this policy. Such instances where there are clear potential benefits to clients should be brought to the attention of the program coordinator. The situation will then be 'risk assessed', any necessary safeguards agreed and a record kept. This approach should ensure that transparency is maintained in agreeing variations and that positive risk taking is managed.



DEFINITIONS

- Line manager** A line manager is a staff member's immediate superior, who oversees and has responsibility for the staff member's work. A line manager may be a supervisor, but a manager at any level with direct responsibility for a staff member's work can be described as a line manager.
- Personal space** Personal space is the area immediately around a person's body. Personal space is viewed differently by different cultures.
- Professional boundary** For the purpose of this policy, a professional boundary is the 'line' between a professional and personal relationship. Professional boundary violations by a staff member represent a breach of trust and a failure to meet a [duty of care](#) to clients. When staff violate professional boundaries they risk:
- harmful consequences for the client
 - serious undermining of their professional reputation and that of FSGA
 - [disciplinary action](#).
- Staff** Staff means everyone who works at FSGA and includes those paid and unpaid.

SECTION 2 - POLICY

Principles

Clients' rights and needs should be respected at all times. The relationship between a client and a staff member is not one of equal balance. The quality of outputs achieved in any collaboration depends on the level of trust between the participants.

Policy

2.1 Staff recognise and understand that they may be in a position of power. This power must not be abused at any time. It is essential therefore, that all interactions between clients and staff are seen in terms of a professional relationship.

2.2 Staff have a clear framework within which to provide a service.

2.3 Individual staff are responsible for maintaining professional boundaries. Staff are required to ensure that professional relationships are not misread or confused with friendship or other personal relationships. This is essential in order to protect clients at a time when they may be vulnerable. It also protects staff from any risk of potential false allegations. Failure to meet this responsibility may lead to formal [disciplinary action](#) being taken against them.

2.4 Staff are supported to maintain and monitor professional boundaries.

2.5 Clients are provided with information on FSGA's philosophy and right to express a grievance or make a complaint.



SECTION 3 - PROCEDURE

3.1 Defining the relationship

3.1.1 FSGA staff sign the [Code of Conduct](#) prior to employment and seek advice from their line manager or the HR manager if in any doubt about appropriate actions.

3.1.2 Staff who feel a colleague is at risk of potential breakdown of professional boundaries have a duty to protect both clients and staff, and staff should bring the matter to the attention of the line manager.

3.1.3 In accordance with the [Managing Conflict of Interest Procedures](#), staff alert their line manager if they have personal knowledge of a client to whom they provide a direct service. If a staff member is aware, or becomes aware, that he/she is related to a client they bring this to the immediate attention of their line manager.

3.1.4 Staff sensitively define professional boundaries with a client if required.

3.1.5 Clients are provided with information on FSGA's philosophy in the [FSGA Statement Fact Sheet](#) and their rights and responsibilities in the [Client rights and responsibilities](#).

3.2 Monitoring the relationship

3.2.1 Staff are provided with regular supervision (refer to the [Employee performance review policy](#) and the [Staff supervision policy](#)), which is used constructively in the area of disclosing any inappropriate feeling that they may be developing for a client. These disclosures will be kept confidential unless the situation remains unresolved and the relationship develops into a personal one, in which case the line manager will be responsible for seeking further advice from their line manager on the situation.

3.2.2 Line managers ensure support and guidance is provided to staff where the staff member is finding it difficult to maintain professional boundaries.

3.2.3 Staff constantly monitor their relationship with clients to ensure it hasn't crossed, or isn't at risk of crossing, the boundary.

The following questions are a guide to assist staff monitor their relationship with clients:

Am I dealing in a different manner with a particular client than with others under the same circumstances?

Is my dress/availability/language different from the normal with a particular client?

Would I do or say this if a colleague were present?

Would I condone my conduct if I observed it in another DSE?

Are the consequences of my actions likely to have negative outcomes for clients?

If I were the client's parent/guardian/carer would I want an adult behaving this way towards the client?

3.3 Befriending and friendship

3.3.1 Staff cannot overstep professional boundaries and confuse befriending clients with friendship in any situation.

3.3.2 Befriending a client is a professional relationship, made to meet client's needs.

3.3.3 Becoming a client's friend is a relationship that focuses on the needs of both people. A professional relationship focuses solely on the client's needs.

3.3.4 Befriending is an appropriate relationship for staff and part of building the necessary trust to work with clients.

3.3.5 Becoming a client's friend is inappropriate; staff are employed by FSGA to walk alongside clients as part of the contract of employment and it is potentially an abuse of power to represent the relationship as a friendship.

3.3.6 Staff and clients should be in a mutual relationship where they can learn and grow together.

3.4 Counselling

3.4.1 It is appropriate for staff to use counselling skills (such as active listening with a non-judgmental approach) but not appropriate for them to provide counselling to clients. When a



client requires counselling DSEs are to refer the matter to the line manager who ensures advice and support is provided on accessing other appropriate services.

3.5 Providing advice

3.5.1 In general, advice is normally only offered to clients when they request it, unless there are good reasons to be more directive. Where staff offer more directive advice, for example, in a situation where there is a potential for immediate physical harm or danger, they should aim to do this in a non-judgemental manner.

3.5.2 Whenever staff offer advice to clients they provide sufficient information for clients to make an informed choice.

3.5.3 Staff are required to be aware of the areas in which they are not qualified to give advice and when it is not appropriate to offer advice e.g. when it is outside of their job description. In these instances they inform the client of this, making every effort to assist them in accessing appropriate and/or qualified advice.

3.6 Influence

3.6.1 Staff are careful not to influence clients with their own beliefs and personal values.

3.6.2 Although morality, religion and politics are common areas of conversation, and clients may wish to discuss their views with staff, staff never promote or impose their own views on these subjects.

3.7 Approachability

3.7.1 Staff must be approachable, open to fair and reasonable challenge and feedback and positively interact with clients. They should not be seen by clients as intimidating or inaccessible.

3.7.2 Clients are not discouraged from accessing support within agreed boundaries or from making complaints (refer to the [Complaint policy - client complaint](#)).

3.8 Touch – physical contact

Also refer to

[APPENDIX B – Touch and physical](#) intervention for more detail

3.8.1 Some clients may misinterpret physical contact as affection outside the professional



relationship. Clients may also see physical contact as expressions or favouritism e.g. where a staff member hugs one client and not another. All staff should therefore be aware that physical contact presents the risk of being misunderstood, and it may result in staff being vulnerable to allegations of inappropriate professional behaviour.

3.8.2 When touching occurs, it is required to only take place within the context of a professional relationship and with the client's agreement. The limits and boundaries for touch between staff and clients are required to be fully described and documented on the individual plan.

3.8.3 In those service contexts where touching is an integral part of service delivery, staff discuss the subject regularly at staff meetings so as to ensure consistency and clarity of approach.

3.9 Financial relationships:

3.9.1 Staff do not enter into any financial transactions with clients including buying, selling, exchanging or bartering goods or services.

3.9.2 Staff do not lend their personal money or possessions to clients.

3.9.3 Staff do not borrow money or possessions from clients.

3.9.4 Staff do not give or accept gifts from clients.

3.9.5 Staff do not accept monetary charitable donations to the service without the prior agreement of the CEO.

3.9.6 Staff do not normally handle money on behalf of clients except in clearly defined work instructions (refer to the [Management of client finances policy](#)).

3.9.7 Staff do not agree to become trustees, beneficiaries or executors in relation to clients' wills.

3.10 Relationships and contact with clients within work:

3.10.1 Where staff members know clients prior to them entering the service, the staff member informs their line manager (in accord with the [Managing Conflict of Interest Procedures](#)).

3.10.2 When new staff members start work and find that they know existing clients, they bring this to the attention of their line manager. The line manager explores with the staff member any issues around confidentiality and risk.

3.11 Relationships and contact with clients outside of work:

3.11.1 Staff only arrange for clients to visit their homes if approved by the program coordinator. This will only be done following a thorough risk assessment and in the context of the client's preferences and individual plan. The risk assessment includes completing the required documentation.

3.11.2 Staff do not encourage clients to develop friendships with the staff member's relatives or friends.

3.11.3 Staff do not give clients their personal contact details, for example postal address, phone number, fax number, email address, social media contact details.

3.11.4 Staff do not give clients the personal contact details of any colleague.

3.11.5 Staff who encounter clients out of hours should be pleasant and civil if approached by the client, but should generally discourage prolonged social contact.

3.11.6 Staff should not approach clients in any social setting if the contact is not instigated by the client, especially where the client's behaviour indicates that they do not want to be recognised or indeed identified as an FSGA client.

3.11.7 Staff do not arrange out-of-work-hours contact with clients.

3.12 Discussing others:

3.12.1 Gossip or hearsay does not feature as an aspect of FSGA service culture and is actively discouraged among both staff and clients.

3.12.2 Staff never share personal details about other staff with clients.

3.12.3 Staff never discuss other staff members with clients except on issues relating to service provision e.g. discussing the possibility of a new client moving into a house.

3.12.4 Staff never discuss clients with other clients and other third parties unless it is the staff member's role and related to service delivery (refer also to the [Media relations policy](#)).

3.12.5 Where any of the above does occur, the incident is brought to the attention of the relevant line manager as soon as possible.

3.13 Managing boundary issues

3.13.1 Staff may unwittingly be put in a position where their relationship with clients is compromised or be drawn into conversations or situations where their boundaries are being stretched or crossed. In some situations the fine line between good and bad practice may not always be obvious or clear. In this situation a staff member seeks the guidance of their line manager if they are unsure about the nature of a relationship developing with a client or if they need advice on how they intend to deal with a situation. Similarly if the immediate line manager requires advice they consult with their line manager.

3.13.2 In situations where it has not been possible to access line manager support, any action which has been taken is discussed with the line manager as soon as is possible.

3.13.3 Other people in the team, particularly those who are likely to work with the client, are informed of where a boundary has been blurred or crossed so they can maintain consistent practice with that client (and a consistent explanation with other clients) and to ensure that the action taken is transparent.

3.13.4 A written record of a broken or blurred boundary is kept on the employee's file.

3.13.5 Boundary issues are discussed with the line manager and within each team on a regular basis, and on occasions specific team training or facilitated discussion may be appropriate.

3.14 Examples of violation of professional boundaries

Refer also to [APPENDIX A - DSE frequently asked questions](#).

All DSEs are responsible for maintaining professional boundaries between them and a client. This means establishing clear professional boundaries with clients that serve to protect everyone from misunderstandings or a violation of the professional relationship.

The following table, whilst not exhaustive, has examples of violations of professional boundaries:

Professional staff boundary	Example of violation
3.14.1 Communication	<p>Inappropriate comments about a client's appearance including excessive flattering comments.</p> <p>Inappropriate questions regarding client hygiene or sanitary issues.</p> <p>Inappropriate conversation or enquiries of a sexual nature (e.g. questions about a client's sexuality).</p> <p>Use of inappropriate pet names e.g. names describing a person's physical appearance.</p> <p>Vilifying or humiliating comments about the client to the person or others.</p> <p>Jokes or innuendo of a sexual nature about the client to the person or others.</p> <p>Obscene gestures and language.</p> <p>Facilitating access to pornographic or overtly sexual material.</p> <p>Failing to stop harassment between clients.</p> <p>Correspondence of an inappropriate personal nature, including letters, email, phone, SMS text. This correspondence would violate the boundary if it uses language which may confuse the relationship e.g. "love you".</p> <p>Body language of the nature described in this section.</p>
3.14.2 Personal disclosure	<p>Discussing personal details of lifestyle of self or others (it may be appropriate and necessary, at times, to draw on relevant personal life experiences when mentoring).</p> <p>Sharing of personal information about other staff or clients.</p> <p>Keeping secrets of a personal nature after client disclosure i.e. encouraging clients to have secrets.</p>

Professional staff boundary	Example of violation
3.14.3 Privacy, dignity and confidentiality	Failing to comply with the Privacy, dignity and confidentiality policy which details personal hygiene procedures, clients' rights to personal relationships, clients' property and personal information.
3.14.4 Location	<p>Inviting/allowing/encouraging clients home without FSGA authority.</p> <p>Attending clients' homes or social gatherings for personal reasons without FSGA authority.</p> <p>Being alone with a client outside of a staff member's responsibilities without FSGA authority e.g. visiting a client's home out of work hours.</p> <p>Inappropriately entering a client's room without knocking.</p>
3.14.5 Targeting individual clients	<p>Giving personal gifts and special favours.</p> <p>Adopting a role that is the responsibility of another staff member e.g. counsellor, or doing so without the knowledge of line managers.</p> <p>Treating a client inequitably contrary to the client's best interest.</p>
3.14.6 Physical contact (refer also to APPENDIX B – Touch and physical intervention)	<p>Unwarranted, unwanted and/or inappropriate touching of a client personally or with objects.</p> <p>Initiating or permitting inappropriate physical contact (physical contact is appropriate when in accordance with the individual plan e.g. giving personal care and in some FSGA-approved group activities e.g. beauty therapy).</p> <p>Failing to be sensitive to a person's personal space.</p> <p>Applying unnecessary force (refer to the Assault, abuse and neglect policy).</p>

Professional staff boundary	Example of violation
3.14.7 Role	<p>Acting beyond the responsibilities of role.</p> <p>Acting beyond expertise.</p> <p>Acting without parent (if appropriate) or individual's consent or outside of the individual plan. Examples are:</p> <ul style="list-style-type: none"> ○ taking photographs without consent ○ cutting hair, finger nails or toenails without consent ○ performing alternative therapies ○ conducting religious rituals.
3.14.8 Dress	<p>Wearing inappropriate clothes e.g. sexually revealing (refer to the Dress code policy)</p>
3.14.9 Gifts and hospitality	<p>Accepting gifts given by the client which could be construed as in return for preferential treatment. Where it is difficult to refuse a gift, staff are required to discuss this with their line manager immediately.</p>
3.14.10 Client information	<p>Concealing client information from colleagues, this might include:</p> <ul style="list-style-type: none"> ○ personal information ○ the intention of the client to self-harm or harm others ○ not reporting violent or critical incident/issues ○ child protection issues ○ not completing full records of client interactions.

Professional staff boundary	Example of violation
3.14.11 Medication	Providing substances to clients which are not prescribed (refer to the Providing medical assistance procedures).
3.14.12 Client finances and personal possessions	<p>Inappropriately handling client's finances (refer to the Management of client finances policy).</p> <p>Lending or borrowing clients' possessions without permission.</p> <p>Consuming clients' food.</p> <p>Making private phone calls on a client's phone.</p> <p>Using a client's computer for private use.</p>
3.14.13 Discrimination	<p>Making derogatory comments and discriminating against a client related to:</p> <ul style="list-style-type: none"> ○ culture or race ○ gender ○ sexual orientation or preference ○ age ○ physical characteristics ○ any other personal aspects.

Professional staff
boundary

Example of violation

3.14.14 Dependence

Staff have a responsibility to discourage client dependency.

Some examples of this abuse of power and the potential for creating a dependency are as follows:

- providing a service other than the least restrictive alternative
- socialising outside the professional boundary
- encouraging clients to rely on one staff member
- using the client for the staff member's emotional needs
- buying the client gifts or paying their bills
- discouraging a client's right to make their own decisions and choices (refer to the [Facilitating service user participation procedures](#))
- discouraging a client's participation and integration into the community
- failing to balance [duty of care and dignity of risk](#).

Agreement to comply

I have read, understood and agree to comply with the Professional boundaries policy

Name:

Signature:

Date:

SECTION 4 - GOVERNANCE

Document owner

General Manager – Service Delivery

Approval status

Chief Operations Manager

Legislation

Age Discrimination Act 2004

Anti-Discrimination Act 1991

Australian Human Rights Commission Act 1986

Child Protection Act 1999

Community Services Act 2007

Criminal Code Act 1899

Criminal Code 1995 (Qld)

Disability Services Act 2006

Disability Services Regulation 2006

Guardian and Administration Act 2000

Mental Health Act 2000

Race Discrimination Act 1975

Sex Discrimination Act 1984



Family
Services



Housing
Services



Volunteering
& Community
Services



Holiday Home
Services



Environmental
Services



Internal
Services



Aged Care
Services



Leisure & Event
Services



Disability
Services



Mental Health
Services



Carer
Services



Children's
Services



Training &
Employment
Services



Social
Enterprise



Self Funded
Services

FSGA policies

Assault, abuse and neglect policy
 Client rights and responsibilities fact sheet
 Code of conduct
 Complaint policy
 Dress code policy
 Duty of care and dignity of risk policy
 Employee performance review policy
[Facilitating service user participation procedures](#)
 FSGA statement fact sheet
 Intervention and support policy
 Management of client finances policy
[Managing Conflict of Interest Procedures](#)
[Managing Incidents Procedures](#)
[Managing personal information under the APPs procedures](#)
[Managing direct service delivery risks procedures](#)
 Media relations policy
 Privacy, dignity and confidentiality policy
[Providing medical assistance procedures](#)
 Staff supervision policy
 Workplace disciplinary policy

Supporting documentation

Agreement to work from a DSE's home
 Individual plan

References

[Policy and good practice guidelines professional guidelines - DRH](#) accessed May 2009
[Professional and personal boundaries policy - Hertfordshire Partnership](#) accessed May 2009
[Protective Practices for schools, preschools and out of school care](#)
 Catholic Education Office Diocese of Parramatta Protective Practices For Staff In Their Relationships With Students 2004

Document control

Last review	Reviewer(s)	Review due	Status
2/10/12	Annette Osborne – General Manager Service Delivery Vanness Sharpin – General Manager Corporate Services	2/10/14	Current

APPENDIX A – DSE frequently asked questions

1. What do I do if a client raises significant personal problems with me?

You need to tell a line manager if a client raises significant personal problems with you as they may need to be referred, preferably with their knowledge, to a person with specialised skills, for example, a counsellor.

It may be decided that you can continue to play a supportive role with the client in collaboration with specialist staff if it is in the best interests of the client.

2. What is considered sexual behaviour?

Staff must not, under any circumstances, engage in an intimate, overly familiar or sexual relationship with a client. Improper conduct of a sexual nature by a staff member with a client includes all forms of sexual activity and any other form of child abuse as well as but not limited to the following:

- obscene language or gestures of a sexual nature
- suggestive remarks or actions
- jokes of a sexual nature
- unwarranted and inappropriate touching
- undressing in front of clients
- failing to provide adequate facilities for opposite gender clients to get changed in privacy
- correspondence (spoken or text) with clients in respect of the staff member's sexual or personal feelings for the client
- deliberate exposure of clients to sexual behaviour of others.

3. What if the client is initiating the inappropriate behaviour toward you?

If a client is initiating sexual behaviour with you, you should take immediate respectful steps to discourage the client. If the behaviour is significant, the matter should be reported and documented promptly and a plan of action developed to support the client and relevant staff member. Depending on the age/ability of the client and contextual information this plan of support may involve:



- communication with parents
- referral to and liaison with specialist counselling
- formalised support which may include closer monitoring or supervision
- referral to and liaison with appropriate agency.

4. What is appropriate physical contact?

At times, staff members will be required to give practical assistance to a client who is hurt or needs particular assistance or encouragement. The following examples of physical contact are acceptable:

- administering of first aid
- helping a person who has fallen
- assisting with toileting and personal care needs as described in an individual plan
- non-intrusive gestures to comfort a client who is experiencing grief and loss
- non-intrusive touch e.g. congratulating a client by shaking hands. Staff should remember the importance of accompanying such touch with positive and encouraging words.

APPENDIX B – Touch and physical intervention

1. Touch

- Where appropriate, seek clients' permission to touch, including mobility aids such as wheelchairs.
- Always explain what you are going to do when touch is required.
- Unless required as part of documented planned service delivery, avoid touching a client anywhere other than the hand, arm, shoulder, or upper back.
- Unless required as part of documented planned service delivery, avoid being with a client in a one-on-one, out-of-sight situation and never touch a client in such a situation.
- Do not presume that a hug or a touch is acceptable to a particular client. Even non-intrusive touch may be inappropriate if a client indicates they do not wish to be touched.
- Respect and respond to signs that a client is uncomfortable with touch.
- Use verbal directions and prompts rather than touching e.g. ask a client to turn this way, rather than physically placing the client in the required position. Use this approach for demonstrations in dance, sport, music, drama and personal care. Where touch is essential for safety reasons e.g. with aquatic activities, always tell the client that you need to hold them in a particular way and seek their permission to do so.
- In some circumstances, staff may need to discourage clients from unnecessary reliance on touching such as holding hands or wanting to have hugs or cuddles. This should be done in accordance with details written on the individual plan.
- Clients must not be left in states of high distress for long periods. A supervisor needs to be contacted under these circumstances.

Cultural aspects

Different cultures have different attitudes and traditions surrounding the concept of appropriate touch. Staff have a responsibility to become as familiar as possible with the values of the individuals supported by FSGA.

2. Physical intervention (refer to the [Intervention and support policy](#) for more information)

Clients at risk of being hurt by a client

- Non-physical intervention is the recognised means of managing high risk situations. Where a problem with a client becomes apparent, non-physical interventions include:
 - talking with the individual
 - directing the client to a safe place
 - directing other clients to a safe place
 - sending for assistance from other staff or, in extreme cases, the police.
- Use of verbal directions is always preferred to physical intervention. It is not appropriate to make physical contact with a client (e.g. pushing, grabbing, poking, pulling, blocking etc) in order to ensure they comply with directions. Under no circumstances should staff engage in any form of conduct which might cause physical or emotional harm to clients.
- If a client's safety is threatened, physical intervention can involve:
 - coming between clients
 - blocking a client's path
 - leading a client by the hand or arm
 - shepherding a client away by placing a hand in the centre of the upper back
 - removing potentially dangerous objects
 - using strategies to divert a client from an unsafe activity.
- Staff must never use physical interventions unless client safety or that of others is clearly threatened.
- Appropriate physical force may be permitted to ensure that FSGA's duty of care to protect clients and staff from foreseeable risks of injury is met. Everyone has the right to defend themselves against an attack, provided they do not use a disproportionate degree of force to do so.