CONTROLLED POLICY

C05 – PROFESSIONAL BOUNDARIES, GIFTS AND CONFLICTS OF INTEREST POLICY

Policy Reference	C05	**Version**	1.0
Policy Owner	PHSSL Staffing Limited	**Approved By**	Lade Awosika, Director
Approval Method	Approved electronically	**Approval Date**	September 2026
Review Date	September 2027	**Status**	Controlled Document
Applies To	All PHSSL Staffing Limited staff, agency workers and relevant contractors	**Supersedes**	New policy

1. Purpose

This policy sets out the standards PHSSL Staffing Limited expects in relation to professional boundaries, gifts, hospitality, personal relationships and conflicts of interest. Its purpose is to protect workers, clients, service users and PHSSL from exploitation, favouritism, undue influence and actual or perceived conflicts.

2. Scope

This policy applies to directors, employees, recruiters, compliance staff, agency workers, temporary workers and relevant contractors. It applies both within PHSSL and while workers are assigned to client organisations.

3. Professional Boundaries

Workers must maintain relationships that are appropriate to their role. They must not use their position to obtain personal, financial, sexual or other advantage and must avoid behaviour that could reasonably be perceived as exploitative, coercive or improperly familiar.

4. Boundaries in Care, Health and Education Settings

Workers supporting children, adults at risk, patients, pupils or other service users must follow the client's professional-boundary rules and any applicable professional code. The vulnerability or dependence of a person receiving support makes careful boundaries particularly important.

5. Personal and Intimate Relationships

Workers must not initiate or pursue sexual or exploitative relationships with service users or others where a professional relationship, power imbalance, safeguarding risk or professional prohibition makes the relationship inappropriate. Existing personal relationships that may affect an assignment must be disclosed to PHSSL where relevant.

6. Social Media and Private Contact

Workers should not use personal social-media accounts, private messaging or personal contact details to create inappropriate relationships with service users or other persons encountered through an assignment. Client rules on digital communication must be followed.

7. Money and Financial Dealings

- Do not borrow money from or lend money to service users.
- Do not ask service users, relatives, candidates or clients for personal financial assistance.
- Do not use another person's bank card, PIN or financial information except where specifically authorised within a lawful role and client procedure.
- Do not become involved in personal investments, loans or financial arrangements arising from a position of professional trust.
- Report suspected financial abuse immediately.

8. Gifts and Hospitality

Gifts or hospitality must never influence, or appear to influence, recruitment, allocation, compliance, purchasing or professional decisions. Cash or cash-equivalent gifts from service users, candidates or clients should not be accepted. Modest tokens may only be accepted where permitted by PHSSL and the client and where there is no risk of undue influence.

9. Recording Gifts

Where a gift, benefit or hospitality is offered and is more than a trivial token, the worker should notify PHSSL or the relevant client manager as appropriate. Management may require the offer, acceptance or refusal to be recorded.

10. Gifts to Service Users or Clients

Workers must not give gifts in a way that creates dependency, favouritism, pressure or an expectation of preferential treatment. Any client rules on gifts must be followed.

11. Wills, Bequests and Personal Benefits

Workers must not seek or encourage inclusion in a service user's will, accept substantial personal benefits arising from a professional relationship, or become involved in arrangements that could amount to financial exploitation. Any such approach must be reported promptly.

12. Conflicts of Interest

A conflict of interest exists where personal, family, financial or other interests could influence, or reasonably appear to influence, a person's professional judgement or PHSSL responsibilities. Actual, potential and perceived conflicts should be disclosed.

13. Examples of Conflicts

- Recruiting, vetting or approving a close relative or partner without disclosure.
- Allocating work to friends or relatives for personal reasons.
- Holding a financial interest in a client, supplier or competing staffing business that may influence decisions.
- Accepting benefits from a supplier or candidate in return for preferential treatment.
- Using confidential PHSSL or client information for personal advantage.
- Undertaking outside work that creates a material conflict with PHSSL duties or compromises safe working hours.

14. Family and Personal Relationships

PHSSL does not automatically prohibit relatives or people in relationships from working with or through the organisation. However, relationships must be disclosed where one person can influence the other's recruitment, compliance, pay, allocation, supervision, investigation or other material decision. Appropriate alternative decision-making arrangements should be used.

15. Recruitment and Candidate Relationships

Recruitment staff must not request gifts, money, favours or personal benefits from candidates. Candidate selection, compliance clearance and assignment allocation must be based on legitimate criteria and must not be influenced by friendship, family relationships or personal gain.

16. Client Relationships

Workers and PHSSL staff should maintain professional relationships with clients. Hospitality or personal arrangements must not compromise impartiality, confidentiality, procurement decisions, worker allocation or the ability to challenge unsafe or inappropriate practice.

17. Outside Employment and Business Interests

Workers and staff should disclose outside employment or business interests where these create a material conflict, misuse confidential information, breach contractual obligations or create working-time and fatigue risks. PHSSL will assess each situation proportionately.

18. Confidential Information

Confidential PHSSL, candidate, worker, client or service-user information must not be used for personal, family or commercial benefit. Access to information must be limited to legitimate work purposes.

19. Safeguarding Concerns

A boundary breach involving a child or adult at risk may be a safeguarding matter even if described as consensual or friendly. Workers must follow PHSSL's safeguarding policies and the client's safeguarding procedure and must not investigate the matter independently.

20. Professional Codes

Registered professionals remain responsible for complying with the standards and professional-boundary requirements of their regulator. PHSSL may take assignment or engagement action where conduct creates a professional or safeguarding risk.

21. Disclosure and Management of Conflicts

A person who identifies a conflict should disclose it promptly to an appropriate PHSSL manager. Management will decide whether the conflict can be managed through declaration, recusal, reassignment, additional oversight or another control, or whether the activity must cease.

22. Refusal and Escalation

Workers should politely refuse gifts, benefits or arrangements that breach this policy and explain that professional rules prevent acceptance. If refusal may cause distress or there is uncertainty, the matter should be escalated for advice.

23. Bribery and Improper Influence

PHSSL prohibits bribery and improper inducements. No person may offer, promise, give, request or accept an advantage intended to improperly influence a business or professional decision. Suspected bribery or corruption must be reported immediately.

24. Reporting Concerns

Concerns about professional boundaries, gifts, conflicts, financial abuse or improper influence should be reported to PHSSL management. Safeguarding or whistleblowing routes should also be used where appropriate. Genuine concerns must not result in retaliation.

25. Investigation and Action

PHSSL will assess reported breaches proportionately. Action may include advice, supervision, reassignment, investigation, disciplinary or contractual action, safeguarding referral, client notification, DBS referral consideration or professional-regulator notification where applicable.

26. Records and Confidentiality

Declarations, gift records, conflict-management decisions and investigations will be recorded and handled confidentially in accordance with PHSSL's records-management and data-protection requirements.

27. Staff and Worker Responsibilities

- Maintain professional boundaries.
- Declare relevant conflicts promptly.
- Refuse improper gifts, payments or benefits.
- Do not exploit professional relationships.
- Follow client and professional requirements.
- Report safeguarding, bribery or financial-abuse concerns.
- Cooperate with conflict-management arrangements.

28. Management Responsibilities

- Provide clear guidance on boundaries and conflicts.
- Review declarations objectively and document controls.
- Ensure recruitment and allocation decisions remain fair.
- Respond promptly to safeguarding or financial-abuse concerns.
- Maintain appropriate gift or conflict records.

- Take proportionate action where boundaries are breached.

29. Related PHSSL Staffing Policies

- A03 Records Management, Confidentiality and Data Protection Policy.
- B01 Safeguarding Adults Policy.
- B02 Safeguarding Children and Young People Policy.
- B03 Whistleblowing / Speaking Up Policy.
- B04 Equality, Diversity, Inclusion and Human Rights Policy.
- B05 Modern Slavery, Human Trafficking and Exploitation Policy.
- C01 Recruitment, Selection and Safer Employment Policy.
- C04 Staff Conduct, Capability and Disciplinary Arrangements Policy.
- D04 Working Time, Rest Breaks and Fatigue Management Policy.

30. Monitoring and Review

PHSSL will monitor relevant concerns through safeguarding, complaints, conduct matters, conflict declarations, worker and client feedback and governance review. This policy will be reviewed at least annually, or sooner following significant legal or regulatory change, serious incidents, audit findings or identified learning.

Approved by	Lade Awosika
Position	Director
Approval method	Approved electronically
Approval date / next review	September 2026 / September 2027