CODE OF CONDUCT POLICY

1. POLICY STATEMENT

1.1 This policy lays out the Europia standards and expectations for what is appropriate workplace behaviour at Europia. The code of conduct has been designed with consideration for Europia' values, the clients Europia works with and the services Europia provides.

1.2 The code of conduct is driven by the fact that Europia' reputation and work environment are based on the actions and behaviours of its employees and volunteers. This policy provides guidelines for acceptable behaviour and provides examples of prohibited actions or behaviour. The overall aim of the policy is to ensure that staff will not behave in a way which brings or may bring Europia into disrepute.

1.3 We acknowledge that as a result of their role staff are in a position of power and that the clients are coming to us for support and may be vulnerable. Europia will take proactive steps to address the power imbalance created by service users and service providers. In doing this we commit to protecting our staff and service users from any potential issues arising from unsafe boundaries or from deliberate and willful disregard of expected standards of conduct.

1.4 Awareness and implementation of the policy are the key to the success of this code of conduct being useful and practical. Any modifications and updates to the code of conduct policy will be brought to the attention of all staff. Where reasonably practical all relevant staff will be consulted on modifications and updates to procedures relating to code of conduct procedures.

1.5 This policy does not form part of any employee's contract of employment and it may be amended at any time. We may also vary elements, such as any time limits, as appropriate in any case.

1.6 This policy supports Europia's commitment to safeguarding vulnerable people and complies with the Charity Commission's expectations for charities working with beneficiaries at risk.

2. WHO IS COVERED BY THIS POLICY?

2.1 This policy applies to all current and prospective employees and includes freelancers, contractors and volunteers.

3. WHO IS RESPONSIBLE FOR THIS POLICY?

3.1 While we ask all managers to take responsibility for making sure this policy is complied with, its successful operation also depends on you. Please take the time to read and understand it and to go back to your manager with any questions you may have.

4. WHAT ARE EUROPIA'S STANDARDS?

4.1 Promote and protect the interests of service users and colleagues

4.2 Staff will treat all clients and colleagues with respect at all times upholding their privacy and dignity and treat them as individuals. This includes not being critical of colleagues or behaving in a manner which undermines them in front of other members of staff, clients or external representatives.

4.3 Staff will not discriminate against service users or colleagues by allowing personal views to affect professional relationships or the service they provide. Staff will also challenge colleagues if they think that they have discriminated against or are discriminating against service users or colleagues.

4.4 Staff will prioritise protecting the interests of children connected to Europia' services, having full regard to their educational, childcare, health, leisure, and protection needs.

4.5 Staff will ensure that all clients are aware of relevant policies, rules and procedures and assist them in making sure they are upheld and implemented.

4.6 Staff will behave in a way that discourages a client's dependence either on a particular member of staff or the project itself.

4.7 Bullying and harassment in any form to any individuals is not permitted in line with the bullying and harassment policy.

4.8 Staff will work in a collaborative manner with other Europia colleagues and teams and external organisations as appropriate.

4.9 Staff will not use behaviour or language (verbal and non-verbal) that is discriminatory or could be construed as such. Staff will be polite and courteous.

4.10 Staff will give service users the information they want or need in a way they can understand.

4.11 Unnecessary disclosure or unauthorised disclosure of information regarding work or Europia affairs (such as confidential matters, internal policies, project funding arrangements etc.) to any other individual or outside agency is not permitted. This does not affect an employee's rights under the Public Disclosure Act 1998.

4.12 Staff are not permitted to discuss the conduct or professional performance of their colleagues with anyone other than through the line management structure.

4.13 Staff will behave in a way that establishes and maintains professional boundaries with clients. This professional behaviour will be maintained in all types of communication, including telephone, face to face and on social media.

4.14 Staff must take particular care when using email as a means of communication because all expressions of fact, intention and opinion in an e-mail may bind you and/or the organisation and can be produced in court in the same way as other kinds of written statements. Furthermore, any Europia work email address must be used for work-related matters only (not for personal use) and must not be used outside of regular working hours.

4.15 All conduct must comply with relevant laws including the Equality Act 2010, safeguarding legislation, and health and safety requirements.

5. PROFESSIONAL BOUNDARIES

The following bullet points outline our framework for professional boundaries in specific situations:

5.1 **Outreach activities** - Europia recognises the importance of maintaining professional boundaries in unfamiliar situations particularly where staff are working off site. Staff should take care not to relax professional boundaries while working from another location. Discussions should remain appropriate and focused, steering clear of personal matters and reinforcing the limits of the relationship. - Staff should not offer lifts to service users in their own vehicles and should politely decline any suggestion to do this. They should not ask for or accept offers of cigarettes from service users while on project business.

5.2 **Personal Disclosures** - Staff should take care not to disclose personal information about themselves, their families, other staff members or professionals involved in their support or about other service users. There are occasions where a service user may enquire about an aspect of the staff member's life, experience or situation. These situations must be approached with sensitivity, tact and in a way that reinforces the boundaries of the relationship.

There may be times when it is appropriate to make a personal disclosure but this is not encouraged and the reasons for this should be carefully considered and the implications thought through.

5.3 **Language** - Staff must be mindful of the language they use in their interactions with clients and in particular when using terms of endearment for example, honey/hon, lovely, sweetheart/sweetie. These words can confuse the service user by creating camaraderie and an informality in the relationship or by intimating favouritism or familial regard and affection. Others may find these terms offensive or patronising or they may hold specific meanings based on previous or current use by others. For this reason words that convey familiar warmth and affections should not be used in professional relationships. - This applies to written communication where formal terms should always apply. This includes communication between staff members in message books and emails sent and recorded in the course of their professional role.

5.4 **Friendships and social contact** - Staff are not permitted to form friendships or to initiate or respond to requests for social contact from service users. This includes but is not limited to:

- Exchanging telephone numbers, email address or home address

- Accepting or initiating friend requests from service users on facebook or similar site

- Accepting or initiating invitations to events, parties or other social activities held by the service user or by her associates

Where a staff member has an existing friendship with a person who starts using the service, they will discuss this with their line manager and agree an appropriate plan of action. - It is natural that within any organisation, friendships develop and opportunities for staff to share time in informal settings will arise. Staff are reminded of their professional role and responsibilities and should consider the extent of their friendships with staff in the context of their professional effectiveness.

5.5 **Advice and Information** - Service users will often seek advice and information on a range of issues. When providing this the staff member must ensure they are suitably informed / qualified to offer the advice and information.

5.6 **Physical contact** - Physical contact between staff and service users is not permitted and is not associated with any aspect of service delivery. All staff should be aware of the potential for physical contact to be misunderstood or mistaken for affection, resulting in allegations of inappropriate behaviour or professional misconduct. There may be occasions where physical contact is initiated by the service user to express thanks or gratitude or to receive comfort. This must be actively discouraged and ended as quickly as possible.

5.7 **Alcohol use and smoking guidance** - Staff must consider the impact of their out of work behaviour on their professional reputation and image. Smoking (including regular cigarettes, cigars & E-cigarettes) is not permitted on or near any Europia premises.

5.8 **Sexual relationships** - Staff are not permitted to enter into any sort of sexual relationship with a service user. In this context, this is not limited to physical sexual contact but includes sexualised behaviours which could be interpreted as sexually motivated. These include but are not limited to;

➢ Asking for or accepting a date, meeting or encounter,

➢ Engaging in sexual humour or banter,

➢ Sharing sexual exploits, stories or problems,

➢ Making observations about a service users appearance, body or encouraging any type of bodily exposure.

This activity would be treated as a gross misconduct matter and it could lead to dismissal.

6. USE OF SOCIAL MEDIA

6.1 The widespread availability of social media means it is important to understand how to use it effectively and sensibly, both in the workplace and during personal use. Social media can be a distracting technology which causes a negative effect on the productivity of staff; however, it can also be an engaging platform that enables Europia to build new relationships with new and existing individuals and organisations.

6.2 Social media is a term used to describe a suite of applications or tools on the internet and is sometimes referred to as Web 2.0. Social media is unique because it supports collaboration and the sharing of ideas and opinions across a global scale and the content is usually managed by the users rather than the provider of the applications.

6.3 Social media activities can include, but are not limited to:

➢ maintaining a profile page on social/business networking site such as Facebook or LinkedIn

➢ using sites such as YouTube, Google+, Instagram, Pinterest, Flickr, Tumblr, Reddit.

➢ writing or commenting on a blog, whether it is your own or the blog of another person

➢ taking part in discussions on web forums or message boards

➢ leaving product or service reviews on business websites or customer review websites

➢ taking part in online polls.

6.4 Europia believes that when taking part in social media you should be honest, straightforward and respectful. The lines between public and private can become blurred so assume that everything you write is permanent and can be viewed by anyone at anytime. Also, assume that everything can be traced back to you personally as well as to your colleagues, the organisation and its clients.

6.5 Using social media: Use of social media for personal reasons does not need to be approved by the organisation. However, always identify yourself and make it clear that any opinions are your own and you are not speaking on the organisation's behalf; and use a personal email address and not an organisation's email address.

6.6 The following terms should be adhered to at all times, including during periods of leave. You must ensure that your content, or links to other content, does not:

➢ interfere with your work commitments

➢ contain libelous, defamatory, bullying or harassing content contain breaches of copyright and data protection contain material of an illegal, sexual or offensive nature include confidential information to the organisation include pictures of or comments about clients

➢ involve building or pursuing relationships with service users encourage violence or self-harm

➢ bring the organisation into disrepute or compromise the organisation's brand and reputation

➢ use the organisation's name to endorse or promote any product, opinion or political cause that conflicts with the values of Europia

6.7 Whilst the use of social media and collaborative working is encouraged, responsibilities and expectations covered in other policies remain in force, for example the bullying and harassment policy gives guidance on the type of behaviour we consider unacceptable in the workplace and it is expected that you maintain

the same high standards when using social media. If content published by you or others implicates you in the breach of these terms, it may lead to an investigation and disciplinary action in accordance with the organisation's disciplinary policies. If a staff member is aware that another colleague has used social media in any of the ways listed above it may be helpful to refer to Europia' whistleblowing policy.

6.8 Staff should avoid engaging with any posts, messages or images that may compromise their safeguarding obligations, even in a personal capacity.

7. CONFIDENTIALITY AND PROFESSIONALISM

7.1 Staff must only disclose confidential information if:

- they have permission
- the law allows this
- it is in the service user's best interests
- it is in the public interest

7.2 Staff must maintain professional boundaries even in social settings. Staff should be aware they are representative of the organisation at all times and should avoid behaving in a way that brings it into disrepute. Staff must give thought to the nature of these kinds of social interactions, for example, if a client is seen unexpectedly remembering to keep in mind that there is a possibility of breaching confidentiality procedures by acknowledging a client in a public place.

7.3 Staff will respect the privacy of others. This includes not discussing the private lives of their colleagues with clients or divulging the home addresses or telephone numbers of their colleagues to outside agencies or clients. Similarly, staff should not give clients their own address or personal contact numbers or befriend on social media.

7.4 Staff will maintain professionalism by only using the Europia work email address for professional work-related matters, and not for personal use or use outside of regular working hours. Work within the limits of your knowledge and skills ensuring "fitness to practice"

7.5 Staff shall comply with the terms of their employment and will satisfactorily perform any reasonable request from an authorised manager that is related to their role.

7.6 Staff will only operate within their own levels of competence, ensuring that appropriate information, advice and support is made

available to service users. Staff will refer clients to other services if a client's needs are not best met within their own service and support them in their dealings with other agencies. In making statements to clients, other professionals and the general public, staff will recognise the difference between fact and opinion, acknowledge where professional opinions differ, and state as fact only what has been empirically validated as such.

7.7 Staff will keep their knowledge and skills up to date and relevant to the scope of practice through continuing professional development (CPD).

7.8 Staff will keep up to date with and follow the law, relevant guidance and other requirements relevant to their practice. All personal information must be handled in accordance with the UK GDPR and Europia's Data Protection Policy.

7.9 Staff must ask for feedback and use it to improve their practice.

7.10 Staff must only delegate work to someone who has the knowledge, skills and experience needed to carry it out safely and effectively.

7.11 Staff must continue to provide appropriate supervision and support to those who have been delegated work

7.12 Staff will take all reasonable steps to reduce the risk of harm to service users and colleagues as far as possible.

7.13 Staff must not do anything, or allow someone else to do anything, which could put the health and safety of a service user or colleague at unacceptable risk.

7.14 Staff will disclose any other paid employment or voluntary positions in other organisations to their line manager. This is because it can at times pose a conflict of interest and/or impact on time or commitment in Europia.

8. SAFETY

8.1 Staff must report any concerns about the safety or well-being of service users promptly and appropriately.

8.2 Staff must support and encourage others to report concerns and not prevent anyone from raising concerns.

8.3 Staff must make sure that the safety and well-being of service users always comes before any professional or other loyalties.

8.4 Staff must follow up any concerns that have been reported and if necessary escalate them.

8.5 Staff will adhere to health and safety rules at all times and take responsibility for health and safety for self and others.

8.6 Staff must be open and honest when something has gone wrong with the care or treatment of service users by:

- Informing service users that something has gone wrong
- Apologising
- Taking action to put things right if possible
- Making sure that service users receive a full and prompt explanation of what has happened and any likely effects.

8.7 Staff will be honest and fair in their professional dealings, act with integrity, be conscientious, and thorough in their work, and take account of their obligations under the law and to the wider public interest.

8.8 Gifts, finance and business relationships: Staff should not enter into any type of financial arrangements with service users either formal or informal.

8.9 Staff may accept gifts with no monetary value but these should not be actively encouraged. Where possible and practical this gift should be shared among the staff team.

8.10 Concerns about safety or misconduct should be raised under the Safeguarding or Whistleblowing Policy, depending on the nature of the concern

9. CONSEQUENCES OF NOT FOLLOWING CODE OF CONDUCT

9.1 Consequences of violation of these standards Violation of Europia' code of conduct policy will be seen as a matter of serious consequence and may result in formal warning, suspension, up to and including dismissal.

10. MONITORING AND REVIEW OF THE POLICY

10.1 We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

10.2 This policy will be reviewed annually or sooner if there is a change in relevant legislation, safeguarding requirements, or charity governance best practice. Staff will be informed of any changes and

may be consulted where appropriate

Approving body	Europia Trustees and CEO
Next review date:	August 2026
Reviewer / Changes:	Danail Georgiev