



Saint Felix School

SOUTHWOLD

Counselling Policy 2025/2026

School Proprietor	Mr A Mehta
Date	Autumn Term 2025
Review Date	Autumn Term 2026
Review Period	Annually
Custodian	Assistant Head - Pastoral School Counsellor

Counselling service policy

I Introduction

1.1 The school counselling service is designed to complement the strength of Saint Felix School's pastoral system by offering personal one to one support to students who may benefit from working with a professional counsellor. Each student has a right to confidentiality in counselling, which is vital, to maintain trust between counsellor and client. The counsellor will support students, as far as possible, to make their own choices and decisions regarding counselling and involving parents in the counselling journey, provided this is consistent with the best interests of the student. However, safeguarding of all students must be paramount and there are conditions in which confidentiality cannot be preserved. This policy complies with key legislation (Appendix 1).

1.2 In line with nationally agreed standards for school-based counselling, the school counsellor has an enhanced DBS check, is a qualified counsellor who holds membership with the British Association for Counselling and Psychotherapy (BACP), undertakes regular supervision and is bound by the BACP's Ethical Framework for Good Practice. You can view this in Appendix 2, or from this link: http://www.bacp.co.uk/ethical_framework/

1.3 Definitions and terms used within the policy see Appendix 3.

2 Aims and objectives

2.1 To ensure involved adults respect the rights and importance of students participating in counselling on a voluntary, informed-consent basis.

2.1.1 **Parental involvement** Under the Gillick Competency Principle, young people aged 16 and under have the right to access confidential counselling *without parental knowledge or consent*, provided they are of sufficient intelligence and maturity to understand what is being proposed and the potential consequences. Most senior school students are deemed mature enough to understand the counselling process. The counsellor will assess the student, using Fraser guidelines (Appendix 4) to decide if the student is Gillick competent.

2.1.2 If a student is not deemed to be Gillick Competent, written consent from their parent/guardian will be sought before counselling can begin.

2.1.3 If counselling is to continue beyond six to eight sessions, then parents may be asked to make a small financial contribution to the sessions or arrange private counselling outside of school.

2.1.4 The counsellor can be contacted via her school email smanning@stfelix.co.uk and any communication that is received will be discussed with the student before a full response is made. The school counsellor will not generally encourage ongoing contact with the parent/guardian as this tends to diminish the student's trust in their counsellor and changes their perception that the counselling is their space.

2.2 Safeguarding and Child Protection policy. The school counsellor will follow the guidelines set out in the school Child Protection policy and will refer concerns to the Designated Safeguarding Lead (DSL). This policy outlines the procedures to be followed by the counsellor when child protection concerns are brought to their attention, to ensure they protect and promote the safety and welfare of all students and help maintain confidence in the integrity of the Counselling Service.

2.2.1 The student is told at the start of their first session that the content of their session remains confidential between them and the counsellor with a few exceptions which will be explained and discussed as necessary. Those exceptions are - If the student is being abused or is abusing someone else, if the counsellor considers the student (or another individual) is at risk of significant harm including self-harm and suicidal ideation/attempts. Students will also be informed that the counsellor is required, by law, to report suspicions about terrorism, serious drug trafficking and money laundering and may be required to break confidentiality if a court orders it. (Appendix 5: 7.3 Access to records). The student will sign a counselling written agreement acknowledging terms and where confidentiality may be broken.

2.2.2 A brief confidentiality statement is available and referred to by the counsellor in sessions.

2.2.3 The school counsellor is not required to pass on information about a student breaking a school rule or committing an offence unless by doing so they could be considered to be supporting someone in a crime.

2.2.4 The school counsellor will always make every effort to discuss with the student if there is a need to break confidentiality and this will have been discussed with the student on their first session. If this is not possible before the event the discussion will take place at the earliest opportunity.

2.2.5 The school counsellor may seek specialist advice and guidance from their supervisor.

2.2.6 The student may request that certain member/s of staff are informed of their current situation and the content and limitations of that information will be discussed and agreed with the student in the first instance.

3. Communication

3.1 The counselling policy will be added to the school website for ease of access.

3.2 Students and staff will be made aware of the counselling provision throughout the school by way of posters, assemblies, chapel and staff recommendation.

4. Referral

4.1 Students can self-refer via email directly to the counsellor smanning@stfelix.co.uk .

4.2 Students can be referred by their Head of Year, a member of staff or the DSL. The counsellor will contact the student via their student email to organise an initial appointment.

4.3 Parents can refer their child via telephone/email directly to the school counsellor smanning@stfelix.co.uk or via a member of staff or Assistant Head/DSL amann@stfelix.co.uk .

5. Counselling in action

5.1 There is a room separate from the main school which allows for confidential 1-2-1, face to face sessions.

5.2 The BACP definition of counselling is “Counselling and psychotherapy are umbrella terms that cover a range of talking therapies. They are delivered by trained practitioners who work with people over a short or long term to help them bring about effective change and/or enhance their wellbeing”.

5.3 Counselling offers students time and space to talk about issues that are worrying them and, in turn, it gives the student a chance to develop emotional health and wellbeing, increase resilience, self-esteem and self-confidence.

5.4 Sessions are usually weekly and last for 45 minutes - if that is appropriate for the student. The counsellor will always try to offer appointments at times that will not disrupt the students learning. The number of counselling sessions can vary depending on the needs of the individual student and the counsellor will frequently review with the student how the counselling is working for them and will discuss ongoing needs and desires with regard to the therapy including working towards an ending.

5.5 The school offers three free counselling sessions and if sessions are to continue - with parental consent - there will be a charge made to parents.

6 Endings

6.1 All students have the right to withdraw from counselling at a time of their choosing but they will be encouraged to have at least one ending session to discuss their progress and how they would like to move forward. The counsellor will ensure that the student knows they can start again at any point in the future but it is their choice. This will be made clear at the start of therapy.

6.2 If a student fails to attend a session the counsellor will make contact with them to check all is well. If three consecutive appointments the counsellor will contact the student to ask for a discussion on how and if they wish to proceed.

7 Records

7.1 Short notes are made by the counsellor at the end of the session. These are made and kept on the school system and are available for the counsellor and DSL only. Unless specific arrangements are made, this will be discussed with the student in the first instance.

Appendix I:

This counselling policy and guidelines complies with key legislation and guidance, which includes but is not limited to:

- School Child Protection and Safeguard Policy
- Gillick Competence/Fraser Guidelines (1985) <https://learning.nspcc.org.uk/media/1541/gillick-competency-factsheet.pdf>
- Children Act (1989 and 2004)
- The Childcare Act (2006 and 2016)
- United Nations Convention on the Rights of the Child (1989)
- Education Act (2011)
- Green Paper Every Child Matters (2003)
- Data Protection Act (2018)
- Working Together to Safeguard Children (last updated 12 June 2025)
- BACP Ethical Framework for Good Practice in Counselling & Psychotherapy (2018)
- BACP 4th Edition Counselling in Schools (2006/2007)

Appendix 2: Summary of Ethical Principles for Counsellors and Psychotherapists

(BACP Ethical Framework for Good Practice in Counselling and Psychotherapy)

Ethical Principle

Being Trustworthy: Honouring the trust placed in the practitioner

The Counsellor will:-

- Act in accordance with the trust placed in them.
- Strive to ensure that clients' expectations are ones that have reasonable prospects of being met.
- Honour their agreements and promises.
- Regard confidentiality as an obligation arising from the client's trust.
- Restrict disclosure of confidential information about clients to furthering the purposes for which it was originally disclosed.

Autonomy: Respecting the client's right to be self-governing

The Counsellor will:-

- Ensure accuracy within information given in advance of services offered.
- Seek freely given and adequately informed consent.
- Emphasise the value of voluntary participation in the services being offered.
- Engage in explicit contracting in advance of any commitment by the client.
- Protect privacy; protect confidentiality.
- Normally make any disclosures of confidential information conditional on the consent of the person concerned.

Beneficence: Commitment to promoting the client's wellbeing

The Counsellor will:-

- Act strictly in the best interests of the client based on professional assessment.
- Work strictly within one's limits of competence, training and experience.
- Use regular and ongoing supervision to enhance the quality of services provided.
- Commit to updating practice by continuing professional development.

Acting in the best interests of a client may become paramount when working with clients whose capacity for autonomy is diminished because of immaturity, lack of understanding, extreme distress, serious disturbance or other significant personal constraints.

Non-maleficence: Commitment to avoiding harm to the client

The Counsellor will:-

- Avoid sexual, financial, emotional or any other form of client exploitation.
- Avoid incompetence or malpractice.
- Not provide services when unfit to do so due to illness or personal circumstances.
- Strive to mitigate any harm caused to a client even when the harm is unavoidable or unintended.
- Challenge, where appropriate, the incompetence or malpractice of others.

Justice: Fair & impartial treatment of all clients & provision of adequate services

The Counsellor will:-

- Be just and fair to all clients and respecting their human rights and dignity.
- Consider conscientiously any legal requirements and obligations.
- Remain alert to potential conflicts between legal requirements and ethical obligations.
- Appreciate the differences between people and have a commitment to equality of opportunity.
- Strive to ensure fair provision of services, accessible & appropriate to needs of clients.

Self-respect: Fostering the practitioner's self-knowledge and care for self

The Counsellor will:-

- Appropriately apply all of the above principles as entitlements for self.
- Including seeking therapy and other opportunities for personal development as required.
- Use supervision for personal and professional support and development.
- Seeking training and other opportunities for continuing professional development.

External Supervision.

In accordance with the BACP, the school counsellor will attend regular and ongoing supervision, with an appropriately trained counselling professional, who is external to the school, for the purpose of ensuring best practice and accountability.

When discussing issues relating to a particular student during supervision, the counsellor will take great care not to reveal the full name of the student or disclose any information that would enable the student and their family to be identified.

Appendix 3 Definitions and terms used in this policy

Counselling at Saint Felix School

The school view counselling as a way of helping students to communicate and express their thoughts and feelings, primarily through the process of talking and listening.

However, in many instances, the nature of individual students' difficulties will call for the school counsellor to incorporate other therapeutic activities and non-traditional interventions into their practice, in order to support the student's communication and expression of themselves.

The counselling will encompass a range of activities that support and encourage the development of a strong therapeutic alliance.

Parent

The term 'parent' is used as an inclusive term to refer to all adults who take on a parenting role in relation to a particular student, including biological, adoptive, and foster parents; extended family and other professional care-givers such as staff from group homes.

Informed Consent

The term 'informed consent', as it applies to school counselling, can be defined as the voluntary agreement of a student to participate in counselling, or the voluntary agreement of their parent for the counselling to take place, based on these persons having adequate knowledge and understanding of the counselling process, including confidentiality.

Confidentiality

Confidentiality may be defined as "when a person(s) receives information, that information is kept private and not shared or disclosed without the consent of the person(s) they received it from. This policy covers not only information given deliberately by the person concerned, or by other people about the person, but also information acquired accidentally or through observation.

Appendix 4: Assessing competence to consent by children and young people

The following guidance is based on the Fraser Guidelines and adapted for application to counselling.

Immediate issues

- Child's age: How old is the child or young person?
- Gillick test: Does the child or young person understand the counselling?
- Are they refusing to allow their parents to be involved?
- Do their best interests require that the counselling be given without parental consent?
- Short-term issues:
 - Nature of contact: Is the contact with the counsellor controlled entirely by the child or young person?
 - Support systems: What support does the child or young person have access to alongside or in the place of counselling or therapy, should contact be broken or withdrawn?
 - Nature of immediate issue or problem:
 - What is the degree of risk, if any, posed by the child to him or herself or to others (e.g. drugs, abuse, suicide, arson?) Is the risk significant, immediate or longer term?
- Child protection responsibilities:
 - Is the counsellor required by their conditions of employment, or agency policy, to report all suspected child abuse to social services?
- Longer-term issues:
 - Stage of cognitive and emotional development:
 - Does the child or young person understand the nature of the issue or problem? Their own needs and the needs of others? The risks and benefits of counselling or therapy?
 - Does the child or young person have a sense of their own identity? A sense of time, past, present and future?

Source: Jenkins, 1997: 216-7 (abbreviated version) Page 10 of 11

Appendix 5. Record Keeping and Data Protection

5.1 Saint Felix School Counselling Service keeps written records about students in counselling. A file is kept for each student in a locked filing cabinet, this file contains any art work, completed forms and contracts. All other notes are kept on the school central system and are only accessible by the Counsellor and DSL or others, if previously agreed with the student. The notes are minimal and factual. Notes may also include material such as reasons for referral to counselling, number of sessions attended and an account of the topic discussed in each session. They may also include reports of safeguarding issues. Safeguarding issues will immediately be raised with the DSL.

5.2 Notes on sessions are brought to (external) supervision.

5.3 Under GDPR regulations: data protection principles: Information is:

- Used fairly, lawfully and transparently
- Used for specified, explicit purposes
- Used in a way that is adequate, relevant and limited to only what is necessary
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary
- Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

5.4 Counselling records are retained for a period which is informed by current DPA legislation and good practice within the education sector. Usually this will be for a period of 7 years after the student turns 21 years or 7 years after counselling ends, whichever is the latter.

5.6. Access to records - Under the Data Protection Act (2018), Saint Felix students who access the Counselling Service have the right to see information recorded about them by the school counsellor. The only exception is if a disclosure of information would be likely to cause serious harm to the student. Students cannot see information which is considered third party, or records concerning another person, unless that person has agreed. Where students wish to see their file, they should ask the counsellor and the counsellor should be present to explain what the file contains and the reasons why.

According to guidance from the Information Commissioner, under data protection law, parents have an independent right of access to education records, despite objections by the child, and school counselling records could be classified as such.

This could potentially lead to a situation of a parent seeking access against the student's wishes and presumably, those of the counsellor. In this instance, Saint Felix School would use Schedule 2, Section 4(3) 6(1) of the DPA 1998, on the grounds that any such processing or disclosure is "unwarranted in any particular case by reason of prejudice to the rights and freedom of legitimate interests of the data subject" (i.e. the student concerned).

Where a parent requests to gain access to their child's counselling records, they should make these in writing to the Head, briefly stating their reasons. A request for access needs to be dealt with within 15 days.

Information that may become evidence in a joint investigation by Police and Children's Services into alleged child abuse is an exception to the principle of open access.

5.7 Court

In the event of any court case involving a student, the Judge has power to subpoena counselling notes, or request that a counselling report is provided as evidence for the case. Saint Felix School is under a duty to assert public interest immunity in respect of counselling records, so any party to court proceedings should name the Chair of the Advisory Board in a witness summons.

Where the court orders disclosure of counselling records, the school should contact their legal representative immediately who should communicate directly with the Judge about what is in the best interests of the young person before a court hearing. Advice from the Local Education Authority may help limit the disclosure of confidential counselling material that is not relevant to the court proceedings.

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