



THE ORATORY

The Oratory School (OS)

School Counselling Policy & Procedures

Policy Owner:	School Counsellor
Type of Policy:	Non-Regulatory
Relevant Legislation* (if a regulatory policy)	
Last reviewed by/date:	February 2025
Last approved by/date:	Assistant Head Safeguarding
Next review due:	February 2026
This version published:	February 2025
Circulation:	All Staff & Governors Inspection Portal School Website Parent Portal
Linked policies	

DEFINITION

This policy follows the British Association for Counselling and Practitioners (BACP) definition of formal counselling and provides a framework for the counselling service at The Oratory School (OS) and contributes to the knowledge base of all those that work with the children at the school.

“Counselling takes place when a counsellor sees the client in a private and confidential setting to explore a difficulty the client is having, distress they may have experienced or perhaps their dissatisfaction with life, or a loss of direction or purpose. It is always at the request of the client as no one can properly be ‘sent’ for counselling.

By listening attentively and patiently, the counsellor can begin to perceive the difficulties from the client’s point of view and can help them to see things more clearly, possibly from a different perspective. Counselling is a way of enabling choice or change or of reducing confusion. It does not involve giving advice or directing a client to take a particular course of action. Counsellors do not judge or exploit their clients in any way.

In the counselling sessions the client can explore various aspects of their life and feelings, talking about them freely and openly in a way that is rarely possible with friends or family. Bottled up feelings such as anger, anxiety, grief and embarrassment can become very intense and counselling offers them an opportunity to explore them, with the possibility of making them easier to understand. The counsellor will encourage the expression of feelings and as a result of their training will be able to accept and reflect the client’s problems without becoming burdened by them. Acceptance and respect for the client are essentials for a counsellor and client, enabling the client to look at many aspects of their life, their relationships and themselves which they may not have considered or been able to face before. The counsellor may help the client to examine in detail the behaviour or situations that are proving troublesome and to find an area where it would be possible to initiate some change as a start. The counsellor may help the client to look at the options open to them and help them decide the best for them”.
<http://www.bacp.co.uk/education/whatiscounselling.html>

THE ROLE OF THE COUNSELLOR

Counselling within the school environment is an opportunity for the counsellor to provide a safe and supportive environment where pupils and staff can communicate their thoughts and their feelings primarily through the process of talking and listening. This is done without judgement in an atmosphere of respect and empathy and within a secure and trusting relationship. It is necessary that the counsellor is flexible in her approach and able to incorporate the use of non-traditional interventions and other therapeutic activities to support pupil communication and self-expression. It is well-known and documented that it is the quality of the client’s relationship with the therapist that is the greatest predictor of a successful therapeutic outcome rather than the use of any specific technique or approach.

The school counsellor can support pupils and staff by addressing the emotional and behavioural difficulties they might experience, help them work through feelings of sadness, frustration, anger and conflict, cope with periods of crises, improve the relationships they have with others, develop coping strategies and gain a better understanding of themselves.

The counsellor should endeavour to organise and administer the counselling service in conjunction with the school staff and communicate with the school staff in the best interests of the young person and within the limits of client confidentiality.

The counsellor should also encourage the involvement of the young person's family, **but only when this is beneficial and appropriate, and permission has been received by the person.**

The counsellor must act as a resource port of call for all staff members by providing information about what counselling involves and at the same time promote the service where possible and when appropriate.

The counsellor must maintain adequate and appropriate records that are confidential and are password – protected online or kept safe in a lockable filing cabinet on the school premises at all times.

It is an ethical responsibility for the counsellor to maintain regular, on-going clinical supervision with a qualified professional to maintain and monitor standards and to comply with the BACP Ethical Code of Conduct. The supervisory relationship is an essential and important opportunity to anonymously consider the case work that is being done, which contributes to the provision of the highest standards of ethical practice to all clients.

CONFIDENTIALITY

For a relationship of trust to develop between the counsellor and the young person/adult there needs to be a guarantee of confidentiality and a clear explanation and understanding of the exceptions to confidentiality in keeping with child protection policies and procedures. There is no such thing as absolute confidentiality when working with young people and there will be times when the welfare of the child and child protection concerns will take precedence over confidentiality.

Exceptions to the maintenance of confidentiality is when the counsellor believes that the client (or another person) is at risk of significant harm or there is evidence of a serious crime having been committed. It is also required by law that the counsellor reports any knowledge or suspicion of terrorism, drug-trafficking or money-laundering. Confidentiality can also be broken if the counselling notes are subpoenaed by court of law.

The counsellor will discuss all significant concerns as well as moral and ethical dilemmas with relevant personal, which include the DSL and Headr.

Unless there is a strong necessity for there to be a breach of confidentiality such as the examples described above, the counsellor must, at all times treat all personal information about clients in the strictest confidence. This includes all identifying information, names, addresses and any information where a client can be identified directly or by inference.

The school counsellor will only share information on a strictly 'need-to-know' basis, which will be carefully considered and only done in the best interests of the client and to safe-guard the client.

The counsellor will always endeavour to gain the consent of the person before breaking confidentiality, however if the person refuses to give consent, then it will always be that safeguarding the person will take precedence over confidentiality and the person's right to autonomy. This will be communicated to the client before confidentiality is broken and will be discussed with the safe-guarding lead and/or the head of pastoral care before a final decision is made.

Any decisions that are made, will, where possible be communicated to the person so that the person understands the reasoning behind decisions made and actions taken.

When necessary, the counsellor will seek additional specialist advice and guidance to do with safeguarding and child protection issues with their clinical supervisor, Safe-Guarding Lead and Head of Pastoral Care.

PARENT/CARER, CONFIDENTIALITY AND THE GILLICK PRINCIPLE

Confidentiality in a counselling setting is of prime importance in providing the space for a young person to explore challenging and difficult issues within an atmosphere of privacy and trust. Confidentiality facilitates the development of a trusting relationship between the person and the counsellor, it enables the person to share feelings of guilt, blame, reprisal or judgement and it encourages other people to come forward for counselling. Breaches of confidentiality compromise privacy, place people in harm's way, damage the therapeutic relationship and diminish the value of counselling.

The strict boundaries upheld in the counselling relationship may not be fully understood by the teaching staff who are more accustomed to having an inclusive, team-based approach towards the sharing of information between themselves and with parents. Teachers may also wrongly assume that parents always have the right to give or to withhold consent for their child to have counselling and to know of the content of the counselling session/s. These assumptions would be in direct conflict with the Gillick principle, which affords confidentiality to young people under 16 of 'sufficient understanding'. Whether the Head or any other members of staff are automatically informed if a child is having counselling is decided by the institution and is a crucial matter of policy and practice of the school counselling service. Young people under the age of 16 have as much right to confidentiality as any other person and they have the right to access counselling without the consent of their parents if they are considered to be Gillick-competent.

“It may be decided that the child’s right to confidentiality as established by Gillick also extends to the right of privacy of information concerning his or her actual attendance at counselling. This right to pupil confidentiality can be seen to include privacy of information regarding attendance at counselling unless there are overriding reasons, such as a risk of self-harm, which requires that this information is shared directly with senior management. Where information revealing the identity of pupils attending counselling is passed on to the headteacher, disclosing such information clearly only applies to attendance at counselling sessions, and not to the actual content of the counselling sessions”. (Good Practice Guidance for Counselling in Schools-4th Edition, Page 19).

At the OS the counselling appointment list is NOT shared with staff members so that client confidentiality is preserved, but it is shared with the DSL and Head in order that pupils can be accounted for during the school day.

In the Senior School setting young people are much more likely to be Gillick-competent. With this in mind there is usually an understanding by the person that while the majority of the information is strictly confidential, there may be some sharing of relevant information and conversations with key staff members only. **This sharing of information is only done with the young person’s knowledge and consent.** School counsellors recognise the importance of being part of a pastoral care structure and should establish protocols for providing general feedback to the referrers within the system.

In the event of concerns surrounding the abilities and understandings of a young person, an assessment of Gillick Competency must be done. This assessment considers the maturity of the pupil, their intelligence to understand what is being proposed, the intelligence to understand the consequences of their actions and an understanding of the consequences of a possible deterioration in their mental health if they do not access counselling.

There is a likelihood that when working with young people who have special educational needs, the counsellor may have to liaise with parents. **This must be done in consultation with the young person.**

The school should make every attempt to gain the consent/understanding of the parents for a young person to have counselling **except in circumstances involving alleged abuse by a parent or a guardian.** However, senior school pupils more often prefer to remain independent of their parents when making decisions regarding counselling.

The school counsellor will on many occasions be presented with complicated ethical dilemmas. It is the responsibility of the counsellor to discuss these with the relevant school staff members and to reflect on situations with the external clinical supervisor to ensure that the guiding principle, which is the protection of the child is always considered and maintained.

PARENTAL INVOLVEMENT

It is often the case that young people at senior school level do not want parents to be involved in their decision to have counselling or for there to be any sharing of information with parents or carers. This decision is to be respected unless there is a specific reason why parents need to be involved or there is a concern that the young person may not be Gillick Competent. This decision is made by the counsellor in conjunction with members of the pastoral care and safeguarding teams.

If there is a concern that the pupil may not be Gillick Competent, then the school counsellor will, together with other relevant members of the school pastoral team, complete an assessment, using Fraser Guidelines to decide if the pupil is Gillick Competent and therefore able to have counselling without parental knowledge or consent. If it is decided that the **pupil is Gillick Competent**, then neither the pupil or the counsellor need to inform the parents that counselling is or has taken place. If a decision is made that the **pupil is not Gillick Competent**, then written consent must be gained from the pupil's parent before counselling can take place. If the counsellor makes the decision that the pupil is Gillick Competent, then it is up to the counsellor together with the pastoral team to decide if counselling would be appropriate for that child.

It is not always beneficial to the counselling process for the counsellor to encourage on-going contact with parents or attend too many meetings about their child. Research and experience have proved that even though the child/young person might agree to this contact, the perception of counselling being 'their space' is reduced and this can lead to the pupil being less trusting of the counsellor.

Parents should be informed about the counselling service via the school newsletter, pamphlets and any other medium the school might deem to be appropriate in order to make the information widely available to staff, pupils and parents.

ACCESS TO COUNSELLING

Anyone who, on behalf of the pupil, wants to make a referral for counselling, should discuss this with the pupil first. The participation of children and young people is spoken about in Article 12 of the United Nations Convention on the Rights of the Child (UNCRC), which states that:

"parties shall assure to the child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child".

This has been abbreviated by UNICEF to say:

"You have the right to say what you think should happen when adults are making decisions that affect you, and to have your opinions taken into account".

The counsellor must always take the approach that values the young person and respects their right to be informed and involved in any decisions that are being made that include them. Counselling is NOT compulsory, and a pupil can stop anytime they wish.

Referrals for counselling can be received from the pupils themselves or indirectly through members of the pastoral team, teachers, tutor's, parents and others.

For a young person to engage with counselling, he or she should understand the nature of counselling as well as the importance of confidentiality and how this can be overridden if the young person is allegedly at risk of harm from self or another. All of this can be discussed with the pupil at the first session so that a full understanding can be reached.

Requests for counselling will be entered into an appointment system (subject to discussion and the organisation and planning of the school timetable) and the pupil will be seen at the earliest convenience subject to communication with the counsellor and all involved persons. It is very important that the counsellor, where possible be informed of any safeguarding or pastoral issues or if the young person has had counselling in the past or is currently working with another agency e.g. CAMHS or Social Services.

If there is any doubt as to a pupil receiving counselling, then there should be a discussion between all relevant persons to clarify the issues involved and establish the best way forward.

COUNSELLING SESSIONS

Pupils will only benefit from counselling if they want to be in counselling. Counselling is entirely voluntary and takes place only with the agreement of the pupil. This will be referenced in the contract that is prepared between the pupil and the counsellor.

All pupils have the right to withdraw from their counselling sessions at any time and this should be explained to them in a way that is clearly understood by the student.

It is acceptable for pupils to be encouraged and supported by adults while having counselling, but it is never acceptable for pupils to be pressured or coerced into counselling.

Counselling should never be seen as either a reward or a punishment. It is often the case that when a pupil presents with behaviour that is problematic, this is because there is a degree of internal stress and distress being experienced by the pupil and it is at these times that counselling can be most beneficial.

If a pupil presents with erratic attendance the counsellor will communicate with the pupil either by email or on TEAMS to find out how they feel and establish their wish to continue.

CONTACT TIME

The needs of individual pupils and the structure of the school timetable will often dictate the length and frequency of the counselling sessions however counselling sessions for children and young people generally last for between thirty and fifty minutes at the same time every week.

In keeping with the person-centred ethos of the counselling, the service offered is flexible and open-ended. Pupils can attend counselling for as many sessions as they would like providing the counsellor is reassured that progress is being made and the pupil is benefitting from the counselling.

Counselling is an ongoing process, and the counsellor should consistently review the process and encourage pupils to reflect on whether the counselling is meeting the desired outcomes.

The counsellor should work closely with the pupil and teaching staff (where appropriate) to try to ensure that it is not the same lesson that is missed every week. However, it is often the case that students prefer the continuity of the same time every week.

It is important to contract around a set number of sessions and then to review and re-contract when these sessions are completed. Being within a more established framework can help some pupils to feel more safe and secure during counselling.

SUPERVISION

Supervision is a formal arrangement the counsellor has with an outside supervisor who is both experienced in counselling and qualified in supervision. The function of supervision is to oversee the work being done by the school counsellor and serves to protect both the client and the counsellor. The exchange of information is subject to the same requirements with regards to confidentiality and the limits thereof that are observed in a counselling practice. Great care is taken not to disclose the name of the pupil or any identifying information. Supervision is a BACP requirement and serves to ensure that the counsellor maintains an ethical competence and confidence in the work that is being done with all clients. Supervision is an essential requirement in counselling and is clearly described in the BACP's *Ethical Framework*. The accreditation criteria for BACP currently specifies one and a half hours' supervision per month. This is relative to the caseload and school counsellors generally require considerably more than this. Counselling without supervision is considered to be unethical.

RECORD KEEPING AND DATA PROTECTION

Counselling information is kept with the knowledge and consent of the pupil, and they must be made aware of who will have access to the information and why. Information should be kept to a minimum, is strictly confidential and is exempt from disclosure to other parties unless a special request is made to the Head or there is a legal requirement to do so.

Information that includes any safeguarding or child protection issues must be recorded clearly and succinctly together with all discussions had between the different parties, key decisions reached, action/s taken and the subsequent outcome.

Pupil records are retained both password - protected online and in a locked filing cabinet secure from unsupervised access and should never be removed from the building.

Pupil records are retained for a period of 6 years or in certain cases, for a time that is stipulated by the institution.

The counsellor will make brief process notes that can be taken to clinical supervision and then destroyed. These notes do not identify the pupil in any way and are important in that they provide an effective monitoring service of the counselling that is taking place.

It is a legal requirement that sensitive data is protected. **The Data Protection Act (DPA)** updated on the 23rd of May 2018 sets out measures that schools should adopt to maintain data security. The purpose of this act is to protect the individual rights and freedoms with a special focus on the right to privacy with respect to the processing of personal data. The DPA is particularly stringent with regard to sensitive data, which includes pupil characteristics, religious beliefs, ethnic background and would include any information that concerns mental health. The DPA includes all personal data that is held on either a computer system or on paper.

Under the DPA pupils and parents have the right to access information at any time. Any requests for information from either a pupil or a parent must be made either verbally or by email to the Head first. This will involve a process of discussion prior to the information being released. An exception to this would be if the disclosure of certain information could cause harm to a pupil.

It is possible that pupil notes can be subpoenaed and used as evidence by the court. The school should contact their legal representative immediately to establish a protocol and decide upon what would be in the best interest of the pupil before a court hearing.