

Safeguarding and Prevent Policy and Procedure

1. Policy Statement

The organisation is committed to safeguarding and promoting the safety, wellbeing, dignity and rights of all adult students undertaking counselling and psychotherapy training.

Safeguarding is everyone's responsibility. All staff and tutors share responsibility for recognising concerns, responding appropriately, and taking action where a student may be at risk of harm, abuse, exploitation, radicalisation, serious self-neglect, self-harm or significant mental health crisis.

This policy aligns with relevant UK legislation and safeguarding duties applicable to adults and reflects safeguarding principles contained within the BACP Ethical Framework for the Counselling Professions 2026, particularly the responsibilities to keep people safe, act appropriately to protect people from harm, work collaboratively where possible, maintain confidentiality appropriately, and act on safeguarding concerns when legally or ethically required.

2. Scope

This policy applies to:

- Adult students aged 18 years and over.
- All staff and tutors.
- All learning environments, including:
 - Classroom teaching
 - Online learning
 - Placement-related activities
 - Digital communications related to learning

3. Legal and Regulatory Framework

This policy is informed by relevant legislation and guidance including:

- Safeguarding Vulnerable Groups Act 2006
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- BACP Ethical Framework for the Counselling Professions 2026

Where safeguarding concerns arise, actions will be proportionate, lawful, necessary and focused on preventing harm.

4. Principles

The organisation will:

- Promote a culture of safety, respect and wellbeing.
- Treat students with dignity and fairness.
- Encourage disclosure of concerns and take concerns seriously.
- Respond proportionately and promptly.
- Respect autonomy and informed decision-making wherever possible.
- Balance confidentiality with legal and ethical safeguarding responsibilities.
- Work collaboratively with students wherever it is safe and appropriate to do so.
- Maintain accurate records of concerns and actions taken.

5. Roles and Responsibilities

Designated Safeguarding Lead (DSL)

The DSL has overall responsibility for:

- Safeguarding oversight.
- Receiving and managing safeguarding concerns.
- Providing advice to staff.
- Monitoring safeguarding trends.
- Ensuring appropriate record keeping.
- Coordinating Prevent referrals where required.

Staff Responsibilities

All staff must:

- Recognise indicators of abuse, vulnerability or risk.
- Respond appropriately to disclosures.
- Record concerns accurately.
- Report concerns promptly to the DSL.
- Complete safeguarding and Prevent training.

- Maintain professional boundaries.

6. Recognising Safeguarding Concerns

Counselling students may experience risks both within and outside the learning environment.

Potential indicators include:

- Significant deterioration in mental wellbeing.
- Expressions of suicidal thoughts or intent.
- Self-harm.
- Domestic abuse, including coercive or controlling relationships, financial exploitation, and emotional or psychological abuse.
- Hate crime or discrimination.
- Stalking or harassment.
- Sexual violence or sexual harassment.
- Substance misuse creating significant vulnerability.
- Social isolation.
- Self-neglect.
- Radicalisation or extremism.
- Exploitation through online activity.
- Significant changes in behaviour, attendance or engagement.

The presence of one indicator does not necessarily mean abuse has occurred, but concerns should always be considered and discussed with the DSL.

7. Preventing Radicalisation and Extremism

Protecting students from radicalisation forms part of safeguarding responsibilities.

Staff should remain alert to:

- Active support for extremist ideologies.
- Glorification of violence.
- Intolerance towards protected groups.
- Expressions of hatred or encouragement of violence.

- Concerning changes in behaviour linked to extremist narratives.
- Engagement with extremist content online.

Concerns must be reported to the DSL.

Where appropriate, advice may be sought from local Prevent professionals or police-led Prevent teams.

8. Digital Safeguarding

Safeguarding concerns may arise through digital and online activity.

Risks may include:

Content

Exposure to:

- Extremist material
- Discriminatory content
- Harmful misinformation
- Online abuse and harassment

Contact

- Grooming
- Fraud
- Coercion
- Online exploitation

Conduct

- Cyberbullying
- Harassing communications
- Sharing intimate images
- Unsafe use of AI and digital technologies

Consistent with BACP ethical guidance, any use of AI or digital tools should consider privacy, confidentiality, informed consent and potential risks to service users and students.

9. The Five Safeguarding Actions

All staff should follow the Five Rs:

Recognise

Remain alert to indicators of risk, abuse, exploitation or vulnerability.

Respond

Listen, support and take concerns seriously.

Record

Create a factual and accurate record (see Safeguarding Record Form).

Refer

Report concerns promptly to the DSL and external agencies where necessary.

Review

Follow up actions and monitor outcomes.

10. Responding to a Disclosure

When a student makes a disclosure, staff should:

- Listen calmly and respectfully.
- Allow the student to speak in their own words.
- Avoid judgment.
- Avoid leading questions.
- Clarify only where necessary.
- Explain that confidentiality cannot be guaranteed where there is risk of serious harm.
- Reassure the student they have been heard.
- Explain what will happen next.
- Record information as soon as possible.
- Report the concern to the DSL promptly.

Staff must not:

- Promise secrecy.
- Investigate the concern themselves.
- Contact any alleged perpetrator.

- Share information with anyone who does not need to know.

11. Immediate Risk Situations

Where there is an immediate risk of serious harm:

- Contact emergency services on 999.
- Seek emergency medical assistance if required.
- Inform the DSL as soon as reasonably possible.

Examples include:

- Serious suicide risk.
- Threats of serious violence.
- Serious assault.
- Medical emergencies.
- Immediate danger arising from domestic abuse or exploitation.

12. Confidentiality and Information Sharing

Confidentiality is a fundamental professional principle.

However, information may need to be shared where:

- There is risk of serious harm to the student.
- There is risk of harm to another person.
- A serious crime has been committed or may occur.
- There is a legal obligation to disclose information.
- Disclosure is justified in the public interest.

The organisation will seek consent wherever appropriate and possible.

Where consent cannot be obtained, a decision to share information must be based on a clear assessment of risk, necessity and proportionality.

This approach is consistent with BACP guidance on confidentiality, safeguarding and legal responsibilities.

13. Students at Increased Risk

Some adult students may require additional safeguarding consideration, including those who:

- Experience significant mental health difficulties.
- Have disabilities or learning differences.
- Have care and support needs.
- Are socially isolated.

Additional support should be considered where appropriate and proportionate.

14. Concerns About Staff Conduct

Any safeguarding concern involving a member of staff must be reported immediately to the DSL or director.

Examples include:

- Boundary violations.
- Inappropriate personal relationships.
- Exploitative behaviour.
- Bullying or harassment.
- Discriminatory conduct.
- Misuse of professional authority.

Concerns will be investigated fairly, confidentially and in accordance with organisational procedures.

15. Student Wellbeing and Support

Safeguarding includes proactive support for student wellbeing.

Support may include:

- Welfare meetings.
- Reasonable adjustments.
- Referral to health services.
- Signposting to specialist agencies.
- Risk assessment and support planning.

As counselling training can involve significant personal reflection and emotional challenge, staff should remain alert to emerging wellbeing concerns and respond appropriately.

16. Risk Assessment

Risk assessments should be undertaken when:

- Significant safeguarding concerns are identified.
- Activities present additional risk.
- Students disclose information indicating vulnerability.
- Concerns arise regarding behaviour, placements or professional suitability.

Risk assessments should identify:

- Hazards and risks.
- Protective factors.
- Required actions.
- Review arrangements.

17. Record Keeping

Safeguarding records must:

- Be factual and objective.
- Be stored securely.
- Be restricted to authorised personnel.
- Comply with the Data Protection Act 2018 and UK GDPR.
- Record decisions, rationales and actions taken.

Records should be retained in accordance with organisational retention schedules and legal requirements. (See Safeguarding Record Form.)

18. Training and Review

All relevant personnel must receive safeguarding and Prevent training appropriate to their role.

The DSL should undertake enhanced safeguarding training and maintain current knowledge of legislative and professional developments.

This policy will be reviewed annually, or sooner where legislative, regulatory or organisational changes require it.