

# **Counselling Services in Anglican Schools Guidelines**



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## 1 Introduction

### 1. Purpose

Because of their ongoing connections to children and young people, schools have the opportunity to support student mental health and wellbeing, enhance students' skills and social and emotional functioning and offer additional support to students facing more difficult life challenges.

When a school offers a school based counselling service, the Counsellor will play a pivotal role in the provision of counselling and support to students and will develop trusting and supportive relationships with students, families, staff and members of the school community.

These guidelines support the *Counselling Services in Anglican Schools Policy* (the Policy) and provide direction on implementation of the Policy, including roles, responsibilities, processes and operation of the counselling service.

### 2. Guiding principles<sup>1</sup>

All school employees share in the responsibility to promote and provide a safe and supportive living and learning environment for students. This responsibility is placed on them by legislation, their common law duty of care, policy, Ethical Standards and Codes of Practice (as outlined in Appendix 2) and the Gospel teachings of Jesus.

Schools will strive, wherever possible, to help students and families access services to enhance student mental health and wellbeing and, thereby, support students' ability to learn and participate in the school community.

Where schools choose to offer a school based counselling service, the services provided will be directed by the Policy and these guidelines, which are based on the following principles:

- The services provided by a school based Counsellor will enhance students' learning, mental health and wellbeing, their participation in school and classroom activities and connection to the wider school community.
- Counsellors employed by schools will, in all their actions and decisions, respect the rights, dignity and worth of students, families and members of the school community.
- Counsellors will recognise the position of trust they hold and will always act honestly, communicate clearly, remain objective and will not, through their actions or inaction, directly or indirectly cause harm to any individual.
- Schools that choose to offer a school based counselling service will ensure the safety, wellbeing and best interests of students are prioritised and that school and staff obligations in relation to duty of care are fulfilled.
- Counsellors will offer only those services which are within their area of professional competence and will never misrepresent their competence, qualifications, training or experience.
- To ensure a holistic response to students' mental health and wellbeing, Counsellors will, following student and/or parent consent, work in partnership with relevant staff and local professionals and support agencies.

### 3. References, related documents, abbreviations and key terms

Information about relevant references and related documents, including organisational and professional Codes of Conduct, Ethical Standards and Codes of Professional Practice, can be found in Appendix 1. Information about abbreviations, definitions and key terms can be found in Appendix 2.

<sup>1</sup> These guiding principles are based on the Codes of Ethics published by the Australian Psychological Society, Australian Association of Social Workers and the Queensland Guidance and Counselling Association.

## 2 Counsellor roles and responsibilities

### 4. Role of the Counsellor

Where a school chooses to offer a school based service, the Counsellor will provide high quality, evidence based, ethically informed services to students, families and staff and will work within a teams-based framework to help:

- optimise students' potential and enhance their overall wellbeing;
- promote, and help students maintain, effective learning and positive physical and mental health;
- students develop appropriate skills, attitudes and pro-social values and behaviours;
- students and families identify and resolve personal, career and academic issues; and
- the school community understand and enhance the wellbeing of all students.

### 5. Mix of counselling services provided

In those Anglican schools that choose to provide a dedicated school based counselling service, the Counsellor will offer a range of services to students, families and staff. The mix of services provided will vary depending on:

- the needs of the student population;
- the services to be provided, as agreed with the Principal and the Counsellor's line manager;
- the qualifications and expertise of the Counsellor; and
- the types of counselling and support services available within the local community.

### 6. Types of counselling services

In their contact with students and families, the Counsellor may:

- have a one-off discussion with a student;
- complete a brief intervention (see definition in Appendix 2) to deal with issues or gauge a student's needs prior to recommending referral or further assessment and intervention;
- facilitate group sessions in relation to social/emotional learning, skill development, as part of an early intervention or prevention strategy or for information/education; and
- undertake longer term or more complex counselling interventions (see definition in Appendix 2).

During such contacts, the Counsellor may provide one or more of the following services:

- personal counselling;
- prevention and early intervention programs;
- career counselling;
- advocacy and referrals;
- academic counselling;
- case management; and
- psycho-educational / psychometric assessment.

Further information about the different types of counselling services is outlined in Appendix 3.

## 7. Other Counsellor roles and responsibilities

### 7.1 Student protection

#### Reporting and referring

Counsellors will comply with all responsibilities outlined in the *Student Protection in Anglican Schools Policy and Procedures*<sup>2</sup> and will respond in an appropriate, timely manner to all suspected harm to a student including suspected abuse, neglect or inappropriate behaviour by an employee or volunteer towards a student.

#### Designated Student Protection Officer

Given their specialist knowledge and expertise, it is recommended that the school Counsellor be designated as a Student Protection Officer and, on an annual basis, be released to attend specialist child protection training.

#### Additional student protection responsibilities

The Counsellor may also complete other student protection roles and responsibilities including:

- supporting students and families impacted by all forms of harm;
- liaising with external agencies, including Child Safety and police;
- attending Suspected Child Abuse and Neglect (SCAN) Team<sup>3</sup> meetings and liaising with the Department of Education and Training, as the core member representative for education on the SCAN teams; and
- participating on the school's Child and Youth Risk Management Strategy Committee.

### 7.2 Other roles and responsibilities

In addition to the services noted above, Counsellors would also maintain high quality professional records and reports, develop and maintain professional networks and fulfil accountability and reporting responsibilities.

Counsellors may, as required:

- support the Principal, leadership team and school community when responding to critical incidents;
- participate in internal or external meetings and committees; and
- provide professional development or information sessions and resources about issues impacting on student learning, mental health and wellbeing and strategies to enhance learning and wellbeing.

## 3 Operation of the counselling service

### 8. Raising awareness of the counselling service

Schools will ensure staff, students and parents have access to appropriately targeted information and resources about the counselling service.

The information and resources should include details of:

- the Counsellor/s name, contact details and the process to make a referral to the Counsellor;
- the location of counselling rooms/facilities;
- the types of services provided and use of a waiting list, if applicable; and
- availability of the Policy.

<sup>2</sup> When the Counsellor responds to child protection concerns for a child enrolled at an Education and Care Service associated with the school, they must refer to the *Child Protection in Anglican Education and Care Services Policy and Procedures*.

<sup>3</sup> See *ECS Resource Sheet 3B – What is the SCAN Team*.

## 9. Size of the counselling service

Across those schools that offer a counselling service, the size and composition of the service will vary based on:

- the number and type of professionals employed, as determined by the Principal;
- the size and nature of the school (for example, P-12, boarding, primary, secondary); and
- the availability of other support services within the school (for example, Chaplains) and local community.

## 10. Timing of counselling sessions with students

Generally, the Counsellor will have contact with students during school hours.

However, Counsellors may provide services to students outside these hours when:

- a school offers boarding services and the Principal has an agreement with the Counsellor to be available to those students at other times;
- the Principal has requested the Counsellor be available to students and families during crisis situations or following a critical incident; or
- a student and/or parent has requested the service, another service or professional is not available within the community and the Principal has given their approval for the provision of the service.

When a Counsellor intends to provide services outside school hours, when the majority of staff have left the school grounds or during school holidays, such an arrangement must only occur with the knowledge and approval of the Principal. When agreed by the Counsellor and Principal, consent may also be sought from the parent.

## 11. Duration of counselling sessions with students

An individual counselling session with a student could, in most cases, may be up to approximately one hour in duration.

However, the time required to complete a single counselling session will vary depending on:

- the complexity and sensitivity of the issues being discussed;
- the tasks to be completed during the session;
- time requirements associated with administration of psycho-educational assessments; and
- the need for the Counsellor to proceed with a session, following a crisis or critical incident, until all immediate safety and wellbeing issues are identified and addressed.

## 12. Frequency of counselling sessions with students

### 12.1 Frequency of sessions

As stated previously, the frequency of contacts a school based Counsellor has with a student may include:

- a one-off discussion;
- a brief intervention (refer to definition in Appendix 2);
- one or more group sessions; or
- a longer term or more complex counselling intervention (refer to definition in Appendix 2).

### 12.2 Longer term or more complex interventions

#### Circumstances requiring a longer term or more complex intervention

When a student requires longer term or more complex intervention, the school Counsellor will often recommend to the student and/or family that they seek support from an external professional or service.

However, there may be some circumstances when the Counsellor decides, or agrees, to provide a longer term or more complex counselling intervention. Such circumstances may include:

- when referral to an external professional or agency is not possible given local community resources;
- following a request by a student or parent which is supported by the Counsellor;
- due to the need for ongoing case management of the student's case within the school setting;
- when the Counsellor, based on their assessment of the student's needs, determines that the service is in the student's best interests and will support the student's safety, learning or wellbeing; or
- when requested by the Principal or the Counsellor's line manager.

#### Requirements prior to commencement of a longer term or more complex intervention

When the Counsellor intends to provide a longer term or more complex intervention, the Counsellor must advise the Principal of the case.

**NOTE** - This would **not** include specific details of the confidential counselling discussions between the Counsellor and student. The information shared would include the student's name, the type of counselling service to be provided and the rationale for the provision of a longer term or more complex intervention by the school Counsellor.

To comply with privacy and confidentiality requirements, the Counsellor must:

- inform the student and/or parent of the limits of confidentiality, including the requirement to share information with the Principal, as required by the Policy or in accordance with other obligations under legislation, policy or subpoena; and
- obtain written consent from the student and/or parent, including a clear statement about the limits of confidentiality and provision of consent by the student and/or parent to the sharing of information, as per the stated limitations.

#### Privacy and confidentiality and school counselling files

To enable required reporting, while also maintaining privacy and confidentiality of counselling information, schools may wish to create and maintain a two part client counselling record for each student, as proposed by the Australian Psychological Society (APS) in their *Framework for the Effective Delivery of Psychological Services in Schools*.

The two components of the client counselling record would include:

- the *Confidential Client component*, which contains psycho-educational assessments, copies of email communications between the Counsellor and other individuals about a student, reports from another professional, other sensitive documents and detailed notes from counselling sessions; and
- the *Client Service component*, which is largely administrative information, including basic student information, records of the types (ie one-off, brief, longer term or group) and dates of services and categories of counselling services (ie personal, career, advocacy etc).

When obtaining consent, as required above, it would be made clear to the student or parent that:

- information in the Client Service component would be shared with the line manager or Principal, as required by the policy; and
- information in the Confidential Client component would only be shared when required by law<sup>4</sup>, subpoena or to minimise risks to an individual's life or to public safety.

<sup>4</sup> Counsellors are required, by legislation and the *Student Protection in Anglican Schools Policy and Procedures*, to share information with the Principal when they suspect harm or risk of harm to any student or member of the school community from a student.

### Purpose of reporting requirements

This requirement to share limited information with the Principal is necessary to ensure:

- the Principal is able to fulfil their duty of care to a student whose level of need, in relation to mental health, safety or wellbeing, requires longer term or more complex school based counselling services;
- where possible, the Principal has the opportunity to identify strategies or resources from within the school to provide a higher level of support to a student with more complex mental health, safety or wellbeing needs;
- the Principal can consider the impacts on the service of one or more longer term or more complex cases; and
- for both the student and Counsellor's safety, the Principal is aware when the Counsellor will have an increased level of individual contact with a student over an extended period of time.

### 13. Location of counselling facilities

All counselling sessions will take place on school premises in facilities that enable the Counsellor to maintain a student's privacy, ensure the Counsellor's and student's safety and fulfil the Principal's obligations in relation to their duty of care to students and staff.

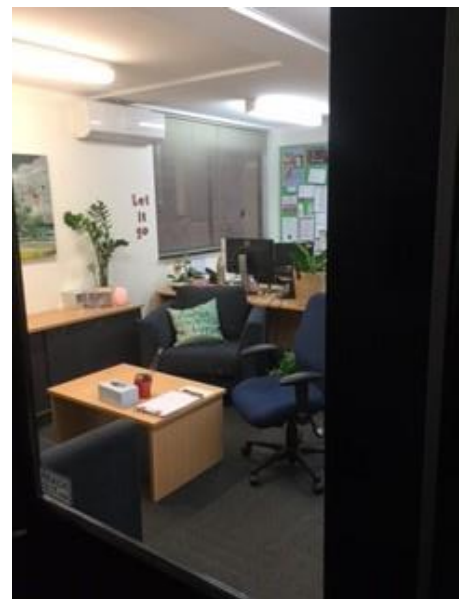
Counselling rooms must not be situated in buildings or locations that are isolated from other staff and should not be designed in a way that prohibits line of sight by other members of staff to the Counsellor.

For example, glass panels in doors and windows should not be obscured. Providing visibility through windows or door panels allows other staff, located near or passing by counselling rooms, to see that a student is meeting with the Counsellor without disclosing details of the conversation between the Counsellor and student.

Student privacy could be further enhanced through the arrangement of furniture in the room. Seating could be arranged so the student's presence in the room is known but they would be facing away from the door/window. The student's face could also be obscured by the positioning of the chair against a wall or the placement of a piece of furniture in front of part of the chair where the student is seated.

The photos below, demonstrate how counselling facilities can be designed to achieve these dual goals of privacy and safety. The photos have been taken from outside the room with the door closed.

Room 1





Room 2



## 14. Communication about a student's whereabouts

Counsellors must ensure they maintain accurate diary records in relation to their scheduled and emergent appointments with all students.

The Counsellor must also ensure a student's absence from class is recorded on the relevant attendance record/system when a student's counselling session occurs during scheduled class times and an appropriate staff member or class teacher is informed of the student's whereabouts.

## 15. Other staff members' responsibilities in relation to counselling services

### 15.1 Principal responsibilities

Where a school has a dedicated counselling service, the Principal will:

- comply with the *Counselling Services in Anglican Schools Policy* and operationalise the counselling service in line with these guidelines;
- ensure their duty of care is fulfilled in relation to the provision of counselling services within the school;
- ensure the Counsellor and other relevant staff comply with the *Counselling Services in Anglican Schools Policy*, their obligations in relation to duty of care to students and relevant legislation, policies and these guidelines;
- ensure regular reporting and communication with the Counsellor and the Counsellor's line manager, as required by the *Counselling Services in Anglican Schools Policy*;
- consider possible conflicts with the counselling role prior to allocating other duties to the Counsellor;
- consider, during planning for counselling services, the recommended Counsellor to student ratio of 1:500;
- ensure the Counsellor has the facilities/resources necessary to deliver high quality counselling services; and
- ensure the Counsellor has the resources and time necessary to complete training required by the school and to fulfil professional obligations in relation to supervision and continuing professional development.

## 15.2 Line manager responsibilities

The Counsellor's line manager will:

- comply with the *Counselling Services in Anglican Schools Policy* and operationalise the counselling service in line with these guidelines;
- ensure the Counsellor complies with the *Counselling Services in Anglican Schools Policy*, their obligations in relation to duty of care to students and relevant legislation, policies and these guidelines;
- ensure regular reporting and communication with the Counsellor, as required by the *Counselling Services in Anglican Schools Policy*;
- ensure the Counsellor has the facilities/resources to deliver high quality counselling services; and
- ensure the Counsellor is provided the resources and time necessary to complete training requirements; and
- periodically update the Principal on their line management of the Counsellor and school counselling service.

## 15.3 Other staff members' responsibilities

Teachers and other members of staff will ensure they:

- understand the services provided by their counselling service;
- refer appropriate matters to the Counsellor in accordance with the school's referral processes;
- maintain the privacy and confidentiality of students and families' information, in accordance with relevant legislation and the *Counselling Services in Anglican Schools Policy*; and
- speak with the Counsellor if uncertain about whether a student or family should be referred for counselling.

# 4 Referral and consent

## 16. Referral

### 16.1 Referral to the Counsellor

Students may access counselling services via a number of pathways including self-referral or referral by a member of staff, parent or external professional.

When a request is made for counselling services, the request, including at a minimum the student details, the referrer's details and the reasons for the referral, must be documented, either by the Counsellor or the referrer, and the record of the referral stored on the student's counselling file.

#### Demand management

When the demand for counselling services exceeds the availability/capacity of Counsellors to meet the level of demand, the Counsellor, their line manager and the Principal will need to agree on a process to respond to any unmet counselling needs.

The Counsellor, their line manager and the Principal will need to consider whether the school will implement a waiting list for counselling services or immediately refer all students and/or families to external services when the school counselling service is at capacity.

When a school decides to introduce a waiting list for the counselling service, consideration will need to be given to:

- the maximum number of students/families that should be on the waiting list at any time;
- the maximum time that a student/family would remain on the waiting list before alternate support/counselling arrangements were offered;
- who would monitor the student's safety and wellbeing while they are waiting to receive a service; and

- whether cases on the waiting list would be re-prioritised due to changes in the level of need or risks.

Following introduction of a waiting list, the school should also ensure that information provided to staff, students and parents about the counselling service includes details about the waiting list.

### Conflicts of interest

When delivering counselling services in schools, a Counsellor may, at times, identify and need to declare a personal or professional conflict of interest. Examples of potential conflicts of interest include when the Counsellor:

- is related to the student requiring a counselling service;
- has a personal or professional relationship with the family of the student requiring a service;
- works part-time at the school and part-time in their own private practice – ethical and professional issues may arise if the Counsellor uses referrals from the school to build their own private practice;
- may be required to give evidence in a Court proceeding involving the student or family and may not want to be perceived to be tampering with or contaminating witness evidence; and
- must balance the student's needs and the school's operating needs ie fee generation or reputational risk.

Whenever the Counsellor identifies a real or potential conflict of interest, before taking any further action, the Counsellor must:

- inform the line manager and/or Principal of the real or potential conflict of interest;
- agree on the parameters for the service and any reporting requirements when a decision is made that the Counsellor can provide the requested services;
- discuss with the line manager and/or Principal possible alternate sources of support for the student and/or family if it is agreed the Counsellor should not to be involved in the case;
- inform the student and/or family of the decision, the rationale for the decision and future actions to help meet the identified mental health or wellbeing need; and
- document the process and decisions made and file the record on the student's counselling file.

## 16.2 Referrals by the Counsellor to external providers

The Counsellor may refer a student and/or family to an external provider when:

- the Counsellor is unable to provide the required service themselves;
- the student requires a more intensive or specialised service; or
- the student and/or parent wishes to access services from a provider external to the school.

In such cases, the Counsellor may provide information to the student and/or parent about appropriate external services or, with student and/or parent consent, may make a referral on their behalf to an external provider.

## 17. Consent for school based counselling services

### 17.1 When is consent required

Valid consent must be obtained prior to providing any counselling service.

**Valid verbal consent** may be relied upon when the counselling service involves brief interventions, academic or career counselling or participation in group or information sessions.

**Valid written consent** must be obtained from a student and/or parent before:

- commencing a longer term or more complex counselling intervention with a student; or
- administering a psycho-educational test particularly when the test is administered, scored or reported on via transmission of student information to an external server which is cloud based or outside Australia.

## 17.2 Who can provide consent

**Parental consent** must be obtained when the student is in primary school or when the Counsellor has deemed that the student does not have the capacity to give informed consent.

**Student consent** alone may be relied upon when the student is in secondary school and is deemed by the Counsellor to have capacity to give informed consent.

The Counsellor must inform the Principal when intending to provide counselling services to a primary school student without a parent's knowledge and consent.

## 17.3 Assessing capacity to consent

When obtaining consent from a student who is deemed to have capacity, the Counsellor must be satisfied that<sup>5</sup>:

- the student is capable of understanding the nature of the services and expressing their own wishes;
- the Counsellor cannot persuade the student to inform their parents;
- the student is very likely to continue with the behaviours or needs that require the counselling service;
- unless the student receives the service, the student's physical and/or mental health will be at risk; and
- it is in the student's best interests to access the counselling service without parental knowledge or consent.

## 17.4 Capacity to consent

The Office of the Information Commissioner<sup>6</sup> has defined the key elements of valid consent as:

- **Voluntary** consent means agreement must be freely given and not based on the person being tricked, forced or threatened if agreement is not given.
- **Informed** consent means the individual has enough information to understand the information to be collected, the purpose, who can access the information, and the consequences of agreeing or refusing agreement.
- **Specific** consent means the individual is given clear information not broad statements.
- **Current** consent means agreement is relevant to the particular time and circumstances. An agreement may not be current if more than six months old.

## 17.5 Referrals without consent

Referrals can be made without student or parent consent to external providers when the Principal believes the student may become a child in need of protection if the family does not receive support and intervention<sup>7</sup>. In these cases, only the Principal, as the prescribed entity, can make the referral.

<sup>5</sup> Based on the Fraser Guidelines presented by Lord Fraser in the 1986 judgement by the English House of Lords in relation to *Gillick v Wisbech Area Health* and as endorsed in common law in Australia in the matter of the *Secretary of the Department of Health and Community Services v JWB and SMB* – also known as Marion's Case.

<sup>6</sup> <https://www.oic.qld.gov.au/guidelines/for-government/guidelines-privacy-principles/key-privacy-concepts/key-privacy-concepts-agreement-and-consent>

<sup>7</sup> In accordance with the *Child Protection Act 1999*.

## 5 Recruitment and support

### 18. Recruitment and selection

#### 18.1 Qualifications and registration/accreditation

When recruiting to a counselling position, schools will comply with the *Staff Recruitment and Selection* policy and identify and select an individual who has the qualifications, experience and demonstrated knowledge and skills to deliver a high quality counselling service.

Schools should, wherever possible, recruit Counsellors who are:

- psychologists registered with the [Australian Health Practitioners Regulation Agency](#) and who may also hold membership of the [Australian Psychological Society](#);
- educators with teaching qualifications and Masters level postgraduate qualifications in guidance and counselling and who are also members of the [Queensland Guidance and Counselling Association](#) or the [Australian Counselling Association](#); or
- social work professionals who are accredited with the [Australian Association of Social Workers](#).

#### 18.2 Selection panels

When forming a selection panel for a counselling position, schools should endeavor to include on the panel a Counsellor from within the school or from another Anglican school.

This will ensure a panel member has the knowledge and expertise in counselling theories and interventions and can advise the panel on the quality of applicants' responses.

### 19. Continuing professional development

#### 19.1 Clinical and/or peer supervision

Counsellors will ensure they satisfy annual obligations in relation to clinical and/or peer supervision, as required by their relevant registering/accrediting authority or professional association.

#### 19.2 Professional development

All Counsellors will ensure they maintain their knowledge, skills and expertise and meet their registering/accrediting authority or professional association's annual obligations in relation to continuing professional development.

### 20. Anglican Schools Counsellors' Network

Counsellors will be members of the Anglican Schools Counsellors' Network which is facilitated by the ASC.

This will include:

- being released to attend scheduled meetings and professional development activities;
- actively contributing to discussions and planning; and
- sharing relevant information to support the sharing of information with all Counsellors in the network.

## 6 Accountabilities and reporting

### 21. Professional accountabilities

All Counsellors employed in Anglican schools must ensure they maintain their registration/accreditation with the relevant registering/accrediting authority or professional association.

### 22. Operational accountabilities

All Counsellors in Anglican schools will be given the guidance and support they require to be able to provide high quality counselling services to students, families and members of the school community. As part of this support, the Counsellor must meet on a regular basis with their line manager (at least twice a term).

During their meeting, the Counsellor and their line manager will:

- discuss the Counsellor's implementation of the counselling role within the school;
- ensure the Principal has been informed of the cases, as required by the Policy including:
  - counselling services to a student outside of school hours;
  - longer term or more complex counselling services to a student; and
  - provision of services to a primary school student without parent knowledge or consent;
- seek out opportunities to address identified gaps in the service or build on existing strengths;
- ensure compliance with obligations under legislation, policy and ethical and practice standards;
- ensure ongoing compliance with obligations/requirements of the relevant registering/accrediting authority or professional association; and
- ensure the Counsellor has access to appropriate facilities/resources to undertake their role.

### 23. Reporting

To ensure the Principal is aware of the services being provided by the Counsellor and to ensure the Principal fulfils their obligations in relation to duty of care, the Counsellor must periodically report to the Principal (at least twice a year) about their activities and the services provided to students, staff and the school community.

This reporting will include:

- the number of counselling contacts with students, staff and families;
- information about cases where the Counsellor is providing, or intends to provide:
  - counselling services to a student outside of school hours;
  - longer term or more complex counselling services to a student; and
  - provision of services to a primary school student without parent knowledge or consent<sup>8</sup>;
- other activities including meetings, training/information sessions, reporting and data/records management; and
- emerging trends in student mental health and wellbeing that may impact the counselling services provided.

<sup>8</sup> As required by the Policy and these guidelines.

## 24. Feedback and review mechanisms

### 24.1 Feedback and complaints

The school will have a process that can be used, if requested, by students, when age and developmentally appropriate, parents or staff to provide feedback on or complaints about the counselling service.

### 24.2 Review of service operations

To ensure the school's counselling service is achieving identified goals/outcomes and is addressing the type and volume of need for counselling services within the school, the Principal, Counsellor and the Counsellor's line manager will, **at least once a year**, review the operation of the counselling service, including relevant data and any feedback on or complaints about the service from students, parents or staff.

## 7 Confidentiality, information sharing and records management

### 25. Confidentiality

#### 25.1 Confidentiality of counselling information

Counsellors must comply with [legislation](#), policy requirements and professional standards in relation to confidentiality of information disclosed, recorded and stored about students and families.

Prior to delivering counselling services, the Counsellor must inform the student and/or parent of any limitations to confidentiality. Unless the information sharing relates to a limitation identified by the Counsellor, including any required by law or subpoena, the Counsellor must obtain written consent from the student and/or parent prior to sharing information.

#### 25.2 Limits of confidentiality

Confidential counselling information must only be shared when required by legislation or subpoena or to ensure the safety of students or members of the school community.

Prior to delivering a service, students and/or parents will be informed of the following limits to confidentiality:

- relevant information must be shared with the Principal and appropriate statutory authorities when reporting suspected abuse, neglect or inappropriate behaviour by an employee or volunteer;
- relevant information must be shared with the Principal and other individuals, as required, when there is a risk to the student's safety or to the safety of other students or members of the school community;
- relevant information must be shared when required by law or subpoena;
- limited information must be shared with the Principal when the Counsellor is providing, or intends to provide:
  - counselling services to a student outside of school hours;
  - longer term or more complex counselling services to a student; and
  - provision of services to a primary school student without parent knowledge or consent<sup>9</sup>.

<sup>9</sup> As required by the Policy and these guidelines.

### 25.3 Requests for information

Schools may receive requests for information about a student and/or family from an external provider. Prior to sharing counselling information, written consent must be obtained from the student and/or parent, unless otherwise required by law or subpoena.

When providing counselling information following receipt of consent by the student and/or parent, the Counsellor should consider how best to maintain the security of the documents/information to be provided. This may include:

- where possible, personally delivering documents;
- meeting with the relevant health practitioner or speaking with them by phone to provide information;
- sending documents via registered post or courier; and
- password protecting electronic documents.

### 25.4 Subpoenas or warrants for counselling records

When a subpoena to produce counselling documents is received from a court or a warrant for a counselling file is produced by the police, the Principal must immediately respond to the request.

However, it is advised that the Principal seek independent legal advice about actions to be taken and should inform the relevant Counsellor/s of receipt of the subpoena or warrant.

## 26. Records management

### 26.1 Records in relation to counselling services

All records in relation to counselling services remain the property of the school and must not be provided or transferred to any other individual, agency or school unless required by law.

When a student is transferring to another school, the Counsellor should only provide a summary of relevant information or copies of relevant documents, as determined by the Counsellor, to the new school following receipt of written consent from the student and/or parent.

### 26.2 Storage of documents

To ensure compliance with relevant [legislation](#) and policy in relation to privacy and confidentiality, all counselling records must be stored securely. Access to Confidential Client component of student counselling records will be restricted to the Counsellor, unless one of the following exceptions apply. The Counsellor, the Counsellor's line manager and the Principal will have access to information in the Client Service component of the record.<sup>10</sup>

<sup>10</sup> The Confidential Client component of the counselling record contains detailed notes from counselling sessions, psycho-educational assessments and other sensitive counselling documents and reports. The Client Service component of the counselling record is largely administrative information, including basic student information, records of the types (ie one-off, brief, longer term or group) and dates of services and categories of counselling services (ie personal, career, advocacy etc).



The following exceptions may require access to relevant information in the Confidential Client component of the counselling record:

- relevant information must be shared when reporting suspected abuse, neglect or inappropriate behaviour;
- relevant information must be shared with the Principal and other individuals, as required, when there is a risk to a student's safety or to the safety of other students or members of the school community;
- relevant information must be shared when required by law or subpoena;
- limited information must be shared with the Principal when the Counsellor is providing, or intends to provide:
  - counselling services to a student outside of school hours;
  - longer term or more complex counselling services to a student; and
  - provision of services to a primary school student without parent knowledge or consent<sup>11</sup>.

### 26.3 Retention and destruction of counselling records

Counselling records must be archived securely and in accordance with school and Diocesan records management and [archiving policies and procedures](#). Counselling records must be managed in compliance with [Australian Privacy Principles](#) (APP) including APP11 in relation to security of personal information.

### 26.4 Requests to access counselling records

When any individual requests access to confidential counselling records, including a student (currently or previously enrolled) or a parent, the Counsellor should advise the individual to request information through the school's *Request for Information* process and procedures (in accordance with Freedom of Information legislation and [Guidance from the Office of the Information Commissioner in relation to privacy of Health records](#)). Any requests for release of information would also take into consideration whether exceptions apply under [s.12.3 of the Australian Privacy Principles](#).

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<sup>11</sup> As required by the Policy and these guidelines.

## Appendix 1 References and related documents

### Anglican Church Southern Queensland

- Code of Conduct – The Corporation of the Synod of the Diocese of Brisbane
- Complaints Management in Anglican Schools – Anglican Schools Commission
- Diocesan Governance Canon Anglican Church Southern Queensland
- Faithfulness in Service – Anglican Church of Australia
- Recruitment and Selection in Anglican Schools Policy
- Professional Standards Canon – Anglican Church Southern Queensland
- Student Protection in Anglican Schools Policy and Procedures: Anglican Church Southern Queensland
- Student Protection Guidelines: Safeguarding our Students

### Australian Association Of Social Workers

- Australian Association of Social Workers (AASW) Code of Ethics
- AASW Ethics and Practice Guidelines
- AASW Practice Standards
- AASW Continuing Professional Development requirements

### Australian Counselling Association

- Australian Counselling Association Code of Ethics
- Australian Counselling Association Supervision Policy
- Australian Counselling Association Membership Requirements

### Australian Health Practitioner Registration Authority

- Australian Health Practitioners Regulation Agency (AHPRA) Registration requirements
- AHPRA Registration Standards

### Australian Psychological Society

- Australian Psychological Society (APS) Code of Ethics
- APS - Managing Student Confidentiality in the School Setting: Guidance for Principals and School Psychologists (Members only)
- APS – The framework for effective delivery of school psychology services: a practice guide for psychologists and school leaders (Members only)

### Psychological Board Of Australia

- Psychological Board of Australian (PBA) Registration
- PBA Guidelines: Continuing Professional Development
- PBA Guidelines for supervisors and supervisor training providers

### Queensland College Of Teachers

- Code of Ethics for Teachers in Queensland – Queensland College of Teachers
- Professional Standards for Queensland Teachers – Queensland College of Teachers

### Queensland Guidance And Counselling Association

- Queensland Guidance and Counselling Association Code of Ethics

### School Based Policy And Procedures

- Privacy Policy – School specific
- School specific Codes of Conduct (Staff) / (Students) / (School Community)

## Appendix 2 Abbreviations, definitions and key terms

### Abbreviations

- AASW - Australian Association of Social Workers
- ACA - Australian Counselling Association
- ACSQ - Anglican Church Southern Queensland
- AHPRA - Australian Health Practitioners Regulation Agency
- APS - Australian Psychological Society
- ASC - Anglican Schools Commission
- PBA - Psychological Board of Australia
- QCOT - Queensland College of Teachers
- QGCA - Queensland Guidance and Counselling Association

### Definitions and key terms

#### Brief intervention

It is acknowledged that different counselling professionals use different terms to describe the nature of their interactions with their clients.

For the purposes of the *Counselling Services in Anglican Schools Policy and Guidelines*, the term 'brief intervention' will be used to describe a short term intervention by the Counsellor where the service is completed in a limited number of contacts, for example up to 3 or 4 contacts. Over the course of a school year, the Counsellor may provide one or more brief interventions to a student which are discreet blocks of service that arise as the student identifies new issues or needs and seeks the Counsellor's assistance in resolving the matters.

#### Confidential Client component of counselling record

The Confidential Client component of the counselling record contains detailed notes from counselling sessions, psycho-educational assessments and other sensitive counselling documents and reports.

#### Confidential Client component of counselling record

The Client Service component of the counselling record is largely administrative information, including basic student information, records of the types (ie one-off, brief, longer term or group) and dates of services and categories of counselling services (ie personal, career, advocacy etc).

#### Counsellor (including School Psychologist)

For the purposes of this policy, a Counsellor is:

- a skilled professional with specialist knowledge and expertise in relation to counselling and career guidance who understands educational systems and the unique complexities of schools and classrooms; and
- an individual who has been employed by an Anglican School and works in that school on a full-time, part-time or casual basis.

A Counsellor may be:

- an educator with teaching qualifications and Masters level postgraduate qualifications in guidance and counselling who is a member of the [QGCA](#) or the [ACA](#); or
- a psychologist registered with the [AHPRA](#) who may also have membership of the [Australian Psychological Society](#); or
- a social work professional accredited with the [AASW](#) who has experience in an educational setting.

### **Longer term or more complex intervention**

It is acknowledged that different counselling professionals use different terms to describe the nature of their interactions with their clients.

For the purposes of the *Counselling Services in Anglican Schools Policy and Guidelines*, the term 'longer term or more complex intervention' will be used to describe a service provided by a school based Counsellor which:

- involves longer term contact with a student, for example more than 3 or 4 sessions, in relation to an ongoing issue or counselling need – for instance, a student's mental health condition may require school based case management over more than six months by the Counsellor as part of a mental health plan coordinated by a psychologist, General Practitioner, Counsellor or private psychiatrist; or
- due to the complexity or level of risk associated with the concerns, would necessitate obtaining valid written consent for the services and/or may require the sharing of information to ensure compliance with duty of care or legislative obligations or to enable the development of a support plan.

### **Parent**

For the purposes of these implementation guidelines, a parent of a child may include:

- the child's mother or father;
- a person who exercises parental responsibility for the child (sometimes also referred to as their carer);
- a person who, under Aboriginal tradition or Island custom, is regarded as a parent of an Aboriginal child or a Torres Strait Islander child;
- a person who is granted guardianship of a child under the *Child Protection Act 1999*; or
- a person who exercises parental responsibility for a child under a decision or order of a federal court or a court of a State.

A person standing in the place of a parent of a child on a temporary basis is not a parent of the child.

### **Out-of-Home Care (OOHC)**

A student in OOHC is a child on a statutory child protection order who is living in an approved OOHC placement including: foster or kinship care; residential care; or therapeutic residential care.

### **Student**

A student includes all students currently enrolled in an Anglican school.

## Appendix 3 Types of counselling services

Type of service	Description of service
<b>Personal counselling</b>	<p>Based on a student's identified needs/concerns and the Counsellor's skills and areas of expertise, the Counsellor <b>may</b> provide one personal counselling in relation to:</p> <ul style="list-style-type: none"> <li>• physical, social/emotional or psychological wellbeing;</li> <li>• problem solving and decision-making;</li> <li>• grief, loss and bereavement;</li> <li>• substance misuse;</li> <li>• stress management;</li> <li>• relationship skills;</li> <li>• coping with crises;</li> <li>• cognitive or developmental issues; and</li> <li>• mental health, self-harming behaviours and suicidal ideations.</li> </ul>
<b>Career counselling</b>	<p>Where career counselling is provided as part of their role, the Counsellor <b>may</b>:</p> <ul style="list-style-type: none"> <li>• help the student explore their options for future education, training or employment;</li> <li>• provide access to resources to support students' planning and decision-making; and</li> <li>• maintain knowledge of education, training and employment pathways and forums.</li> </ul>
<b>Academic counselling</b>	<p>Counsellors <b>may</b> also work with other members of staff to enhance individual student's learning and academic achievement. Academic counselling services may include interventions or programs that:</p> <ul style="list-style-type: none"> <li>• facilitate engagement with learning processes and curriculum materials;</li> <li>• increase motivation to learn and awareness of the importance of lifelong learning; and</li> <li>• identify and address barriers to learning, academic achievement and/or participation.</li> </ul>
<b>Psycho-educational / psychometric assessments</b>	<p>Depending on their role as agreed with the Principal and their qualifications and expertise, Counsellors <b>may</b> complete psychoeducational/psychometric assessments including:</p> <ul style="list-style-type: none"> <li>• psychological assessments;</li> <li>• mental health assessments (eg. anxiety and depression);</li> <li>• behavioural assessments (eg. functional behavioural analysis and attention deficit hyperactivity disorder); and</li> <li>• learning and cognitive assessments (eg. intellectual disability, speech language impairment and learning disorders).</li> <li>• Where the counselling service does not offer assessments or the Counsellor does not have the capacity, qualifications or expertise, the Counsellor may refer a student and their parent to an appropriate external health practitioner<sup>12</sup>.</li> </ul>

<sup>12</sup> Any costs associated with the administration, scoring or reporting of assessments by external providers will not be the responsibility of the Counsellor or the Anglican school.

<p><b>Prevention / early intervention</b></p>	<p>Following discussion with the Principal or the Counsellor’s line manager and identification of issues impacting on particular groups of students or the student population as a whole, the Counsellor <b>may</b> offer prevention and early intervention programs to students and/or families.</p>
<p><b>Advocacy and referral</b></p>	<p>Counsellors <b>may</b>, following receipt of the relevant consent:</p> <ul style="list-style-type: none"> <li>• advocate for students and/or their families with teachers and other members of staff;</li> <li>• liaise with external professionals, including government or non-government agencies or private practitioners;</li> <li>• recommend appropriate external professionals/agencies; and/or</li> <li>• refer students and/or families to external professionals/agencies.</li> </ul>
<p><b>Case management / planning meetings</b></p>	<p>Counsellors <b>may</b> facilitate, or participate in, case management/planning processes at the school in support of a student’s learning or wellbeing. For example:</p> <ul style="list-style-type: none"> <li>• Child Safety case planning or Education Support Planning for a student in out-of-home care (OOHC);</li> <li>• planning with National Disability Insurance Scheme providers; or</li> <li>• planning with private health practitioners or teams such as the Child and Youth Mental Health Service.</li> </ul>