

Safeguarding Policy

SMART MINDS

Effective date: 18 August 2026 | Review date: August 2027

SMART MINDS is committed to safeguarding and promoting the welfare of children, young people and adults at risk. The welfare and safety of the person is paramount. Safeguarding concerns will be taken seriously, responded to promptly and handled with appropriate confidentiality.

1. Purpose and scope

This policy sets out how SMART MINDS will prevent, identify and respond to safeguarding concerns arising through its counselling work. It applies to the founder/counsellor and to any future staff, volunteers, contractors or associates acting on behalf of SMART MINDS.

For this policy, a child is anyone under 18. An adult at risk is an adult who has care and support needs and, because of those needs, may be unable to protect themselves from abuse or neglect. Safeguarding responsibilities apply regardless of a person's background, identity, disability, faith, family circumstances or other protected characteristic.

2. Safeguarding principles

- The welfare, dignity and safety of children and adults at risk are central to our practice.
- Concerns are listened to and taken seriously without judgement.
- The person's voice, wishes and circumstances should be considered wherever this is consistent with safety and the law.
- Safeguarding is a shared responsibility and SMART MINDS will work with appropriate agencies when necessary.
- Information is shared on a need-to-know basis when there is a lawful and proportionate safeguarding reason.
- No promise of absolute confidentiality will be made where someone may be at risk of harm.
- Practice should be inclusive, respectful and alert to discrimination, coercion, exploitation and hidden forms of harm.

3. Legal and guidance framework

SMART MINDS operates in England and will have regard to relevant safeguarding law and guidance, including the Children Acts 1989 and 2004, the Care Act 2014, the Data Protection Act 2018 and UK GDPR, and the current edition of Working Together to Safeguard Children. Where SMART MINDS works alongside schools or colleges, relevant safeguarding arrangements and guidance for those settings will also be considered.

This policy should be reviewed whenever relevant legislation, statutory guidance, professional requirements or SMART MINDS' services materially change.

4. Safeguarding lead

Designated safeguarding responsibility:

- Safeguarding Lead: Usman Ahmed
- Service: SMART MINDS
- Email: [INSERT SMART MINDS EMAIL]
- Telephone: [INSERT BUSINESS/SAFEGUARDING NUMBER]

Where the safeguarding concern relates to the Safeguarding Lead personally, the matter should not be handled solely by that person. Advice or referral should instead be sought from the relevant statutory safeguarding service, police where appropriate, and/or an appropriate independent professional or supervisory contact.

5. Recognising safeguarding concerns

Safeguarding concerns may arise through something a client says, behaviour or presentation observed during a session, information from a parent or third party, or information received outside a counselling session. Concerns can include abuse, neglect, exploitation, coercive or controlling behaviour, domestic abuse, sexual abuse, emotional or physical abuse, financial abuse, discriminatory abuse, online harm, modern slavery, self-neglect in adults at risk, or other circumstances indicating that a child or adult at risk may require protection.

A counsellor is not responsible for investigating or proving abuse. The responsibility is to recognise concerns, record them appropriately, seek safeguarding advice where needed and make an appropriate referral or report.

6. If a client makes a disclosure

If a child, young person or adult at risk discloses possible abuse or harm, SMART MINDS will:

SMART MINDS | COUNSELLING SERVICE

1. Listen carefully and remain calm.
2. Allow the person to explain in their own words without conducting an investigation or asking unnecessary leading questions.
3. Acknowledge what has been shared and explain that the information will be taken seriously.
4. Avoid promising secrecy. Explain that information may need to be shared with people who can help keep them or another person safe.
5. Clarify only the information necessary to understand the immediate safeguarding concern.
6. Make a factual written record as soon as reasonably possible, distinguishing what was said or observed from professional opinion.
7. Consider immediate safety and seek advice or make a referral to the appropriate safeguarding agency without avoidable delay.

7. Responding to immediate danger

If there is reason to believe that a child, young person or adult is in immediate danger or requires urgent medical or police assistance, emergency services should be contacted without delay. Safeguarding action takes priority over routine counselling arrangements.

8. Referrals and escalation

Where a safeguarding concern meets, or may meet, the threshold for statutory intervention, SMART MINDS will contact the appropriate local authority children's social care or adult safeguarding service. Where a possible crime or immediate danger is involved, the police or emergency services may also need to be contacted.

If SMART MINDS is uncertain about the appropriate threshold or response, safeguarding advice should be sought from the relevant local authority or another appropriate safeguarding professional. A concern should not be left unresolved merely because the available information is incomplete.

SMART MINDS will follow the procedures of the local safeguarding partnership applicable to the client's area where relevant. If a referral is made and the response does not adequately address an ongoing safeguarding concern, the matter should be followed up and escalated appropriately.

9. Confidentiality and information sharing

Counselling is confidential, but confidentiality has safeguarding limits. Information may be shared without consent where this is necessary and lawful to protect a child or adult at risk, protect another person, comply with a legal requirement, or respond to a serious safeguarding concern.

Where appropriate and safe, SMART MINDS will explain to the client what information needs to be shared, why, and with whom. Only relevant information should be shared, and disclosures should be proportionate to the safeguarding purpose. A record should be kept of the decision to share or not share information and the reasons for that decision.

10. Working with children and young people

SMART MINDS may provide counselling directly to clients under 18. Before work begins, appropriate consent and contact arrangements with a parent or guardian will normally be established, while also considering the young person's age, understanding and capacity.

The young person should be given an age-appropriate explanation of confidentiality and its limits. Parents and guardians should understand that involvement in the service does not automatically entitle them to a detailed account of everything discussed in counselling. Information may nevertheless be shared where this is necessary for safeguarding or where another lawful basis applies.

The young person's welfare remains paramount. Any conflict between maintaining therapeutic confidentiality and responding to a significant safeguarding concern will be considered in favour of appropriate protective action.

11. Working with adults at risk

When a safeguarding concern involves an adult, SMART MINDS will consider the adult's wishes, capacity, circumstances and the nature of the risk. Wherever possible, safeguarding action should be taken with the adult's knowledge and involvement. There may, however, be circumstances in which information must be shared without consent, including where others may be at risk, coercion affects free decision-making, a serious crime may have occurred, or another lawful safeguarding reason applies.

12. Professional boundaries

SMART MINDS will maintain clear professional boundaries with clients. Counselling relationships must not be used for personal, financial, sexual, exploitative or other inappropriate purposes. Communication outside sessions should be limited to legitimate service, welfare or safeguarding purposes.

Particular care will be taken when counselling people already known through community, sporting, professional or family networks. Potential conflicts, dual relationships and boundary issues should be considered and discussed in professional supervision where appropriate.

13. Online and remote counselling

For remote sessions, SMART MINDS will seek appropriate contact information and, where relevant, establish the client's location and an emergency contact arrangement so that proportionate action can be taken if a serious safeguarding concern arises. Clients should be encouraged to participate from a private environment where possible.

14. Safeguarding records

Safeguarding records should be factual, clear, dated and stored securely. They should record the concern, relevant words used by the person where important, observations, decisions made, advice sought, referrals or information shared, and any follow-up action.

Safeguarding information will be retained and protected in accordance with SMART MINDS' Privacy Policy, legal requirements and the service's retention arrangements. Access should be restricted to those with a legitimate need to know.

15. Supervision and competence

SMART MINDS recognises that safeguarding decisions can be complex. Professional supervision should be used to support reflective and accountable practice, but supervision must not delay urgent protective action. The counsellor will maintain safeguarding knowledge appropriate to the client groups served and undertake relevant continuing professional development.

16. Safer working and future recruitment

If SMART MINDS engages additional staff, counsellors, contractors or volunteers, it will adopt safer recruitment arrangements appropriate to their role. These may include identity and qualification checks, references, safeguarding expectations, appropriate DBS checks where the role is eligible, induction, supervision and clear procedures for reporting concerns or allegations.

17. Allegations or concerns about a person working for SMART MINDS

Any allegation that a person working for or on behalf of SMART MINDS has harmed, abused, exploited or behaved inappropriately towards a child or adult at risk must be treated seriously. Appropriate statutory procedures and referral routes should be followed, including consultation with the relevant local authority safeguarding service and, where applicable, the Local Authority Designated Officer (LADO) in relation to concerns about a person who works with children.

18. Whistleblowing and professional concerns

Anyone working with SMART MINDS should be able to raise a safeguarding or professional conduct concern without fear of retaliation. Concerns should be raised with the Safeguarding Lead unless that person is implicated, in which case the concern should be raised directly with an appropriate external safeguarding or professional body.

19. Review and learning

Safeguarding practice will be reviewed after significant incidents or concerns to identify learning and improve procedures. This policy will be reviewed at least annually and sooner if law, statutory guidance, service delivery or safeguarding arrangements change.

20. Key external safeguarding routes

SMART MINDS will maintain an up-to-date internal safeguarding contacts sheet for the areas in which clients are located, including local authority children's social care, adult safeguarding, LADO arrangements where relevant, and emergency services. Contact details should be checked at the point they are needed rather than relying on an outdated number stored in this policy.

Implementation checklist

- Insert the SMART MINDS safeguarding email and telephone number.
- Maintain a separate current list of local safeguarding referral contacts for the areas in which clients are seen.
- Confirm DBS eligibility and status for all relevant roles.
- Use a safeguarding concern/incident recording form.
- Explain confidentiality and safeguarding limits during contracting and at the start of counselling.
- Maintain appropriate professional supervision and safeguarding CPD.
- Review this policy annually and after any significant safeguarding incident.