WhiteTrees School
Safeguarding Policy for External Therapists and Counsellors

School-specific procedures, governance and safeguarding expectations

OUR VISION

Our vision is to provide pupils with the confidence, skills and ambition to achieve a successful and productive life. We aim to ensure they leave the school with a 'new day, new opportunity' ethos and are capable of becoming positive members of their communities. To do this, we have 3 principles that underpin our policies, practices and everything we do.

Everyone can learn, achieve and has the potential to be successful

Positive relationships are key to success and are underpinned by mutual trust, respect and caring for one another

Policy owner: WhiteTrees School

Date of review: 07.09.2026

Date of next review: 07.09.2027, or earlier where required

Applies to: All external therapists, counsellors, psychotherapists and therapeutic practitioners working with WhiteTrees School pupils

1. Purpose

This policy sets out the safeguarding responsibilities, governance arrangements and professional expectations for external therapists, counsellors, psychotherapists and therapeutic practitioners providing services to pupils at WhiteTrees School. It is designed to operate alongside, and not replace, the School's Safeguarding and Child Protection Policy, Staff Code of Conduct, Safer Recruitment Policy, Behaviour Policy, Complaints Policy, Whistleblowing Policy, Online Safety arrangements and other relevant school procedures.

The policy is intended to ensure that therapeutic provision is delivered within the School's safeguarding culture, leadership and governance arrangements, with clear accountability for the safety and welfare of pupils.

2. Scope

- All external counsellors, psychotherapists, clinical and other therapists, supervisors, independent practitioners and therapeutic service providers working with pupils at WhiteTrees School.
- Practitioners working on a self-employed, contracted, agency, commissioned, sessional or other external basis.
- All face-to-face, off-site and remote/online therapeutic work commissioned or authorised by the School.
- Where an external practitioner works across WhiteTrees residential and education settings, the practitioner must comply with the safeguarding arrangements that apply to the setting in which they are working. This policy specifically governs their work with WhiteTrees School pupils.

3. Legislative, Regulatory and Professional Framework

This policy should be read in conjunction with the current versions of:

- Keeping Children Safe in Education (KCSIE) – including the requirements applying from September 2026.
- Working Together to Safeguard Children 2026.
- The Education (Independent School Standards) Regulations 2014, particularly Part 3 (welfare, health and safety of pupils) and Part 8 (quality of leadership and management).
- Children Act 1989 and Children Act 2004.
- Data Protection Act 2018 and UK GDPR.
- Human Rights Act 1998.
- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance, where applicable.
- Relevant DBS and safer recruitment requirements.
- The School's own safeguarding, child protection, information governance, complaints, whistleblowing and staff conduct procedures.
- The ethical and professional requirements of the practitioner's registering or accrediting body, for example BACP, HCPC, GMC or an equivalent professional body.

Where statutory guidance, legislation, professional regulation or WhiteTrees School procedures are updated, the most current requirements take precedence and this policy will be reviewed accordingly.

4. Governance and Accountability

Safeguarding within the School is governed through the School's established leadership and governance structure. External therapists are not separate from these arrangements when working with pupils; they form part of the wider safeguarding system and must work within the School's policies and reporting routes.

- The Proprietor/Governing Body or other body responsible for governance retains strategic oversight of safeguarding and must ensure that safeguarding arrangements are effective and appropriately monitored.
- The Headteacher and senior leadership team are responsible for ensuring that the School's safeguarding procedures are implemented effectively.
- The Designated Safeguarding Lead (DSL) has day-to-day responsibility for safeguarding and child protection arrangements, including receiving and coordinating safeguarding concerns and referrals.
- Deputy DSLs support the DSL and may receive safeguarding concerns in accordance with the School's procedures.
- The DSL, Headteacher and relevant senior leaders retain oversight of safeguarding concerns involving external practitioners and will liaise with the Local Authority Designated Officer (LADO), children's social care, police or other agencies where required.
- The School's governance arrangements must provide appropriate oversight and challenge of safeguarding practice, including the effectiveness of policies, safer recruitment, training, record keeping and responses to safeguarding concerns.
- The external therapist remains professionally accountable to their own regulatory/accrediting body but, while working at WhiteTrees School, must also comply with the School's safeguarding requirements.

5. Safer Recruitment and Pre-Engagement Checks

No external therapist may begin therapeutic work with a pupil until the School has completed the checks and approval processes required for the role. The level of check must be determined by the nature of the role and the applicable DBS/safer recruitment requirements rather than assumed solely from job title.

- Appropriate identity and right-to-work checks including verficiation, where applicable.
- Enhanced DBS check for children and adults
- Verification of professional registration, accreditation and/or membership where applicable.
- Evidence of appropriate professional indemnity insurance.
- Evidence of relevant safeguarding training and any additional training required by the School.
- Appropriate references and other suitability checks in line with the School's safer recruitment procedures.

- Confirmation that the practitioner has read and agreed to comply with this policy and the relevant WhiteTrees School safeguarding procedures.

Where a therapist is supplied through an agency or third-party organisation, the School will establish in advance which checks have been completed by the agency and which checks the School must complete or verify. Contractual arrangements must clearly set out safeguarding expectations.

6. Induction and Access to School

- External therapists must receive an appropriate safeguarding induction before commencing work.
- The induction will include the identity and contact details of the DSL/DDSLs, the School's reporting routes, emergency arrangements, relevant behaviour and professional conduct expectations, confidentiality and information-sharing requirements, and procedures for allegations against adults.
- Therapists must understand that safeguarding concerns must be reported through the School's procedures even where the concern arises during a confidential therapeutic session.
- Therapists must comply with the School's visitor, signing-in, site security, identification, lone-working and emergency procedures.
- Therapists must only access areas, systems and information necessary for their role and authorised by the School.

7. Safeguarding Responsibilities of External Therapists

- Maintain a child-centred approach and act in the best interests of the pupil.
- Remain alert to abuse, neglect, exploitation, self-harm, suicidal ideation, child-on-child abuse, online harm, radicalisation, criminal exploitation, domestic abuse and other safeguarding risks.
- Listen to pupils, take disclosures seriously and ensure that pupils' wishes and feelings are appropriately considered.
- Report safeguarding concerns without delay through the School's safeguarding procedure.
- Maintain appropriate professional boundaries at all times, including boundaries concerning communication, social media, gifts, physical contact and contact outside agreed therapeutic arrangements.
- Work within professional competence and only deliver interventions for which they are appropriately trained and qualified.
- Maintain appropriate clinical/professional supervision and comply with the requirements of their professional body.
- Maintain accurate, factual and timely records of therapeutic work and safeguarding concerns in accordance with School and professional requirements.
- Cooperate with safeguarding enquiries, child protection processes, multi-agency meetings and information requests where lawful and required.

- Never investigate a safeguarding concern independently or attempt to determine whether an allegation is true.

8. Reporting Safeguarding Concerns

The following procedure applies to any safeguarding concern arising during or outside a therapeutic session:

1. The therapist must report the concern to the DSL or DDSL without delay and in accordance with the School's safeguarding procedure.
2. If the DSL/DDSL is unavailable, the therapist must follow the alternative contacts set out in the School's safeguarding policy/DSL appendix. The absence of the DSL must never be used as a reason to delay action.
3. If a pupil is in immediate danger, the therapist must contact emergency services where necessary and then notify the School's safeguarding lead as soon as possible.
4. The therapist must make a clear, factual record of what was observed, heard or disclosed, including the pupil's own words where relevant. The record must distinguish fact from professional opinion.
5. The therapist must not promise confidentiality, secrecy or a particular outcome.
6. The therapist must not interview witnesses, confront an alleged perpetrator, undertake their own investigation or attempt to reach a finding about the allegation.
7. The therapist must follow the School's arrangements for recording and securely transferring safeguarding information.

9. Allegations or Concerns About an Adult

Any allegation or concern about the behaviour of an external therapist, member of staff, volunteer, contractor or other adult working with pupils must be reported immediately in accordance with the School's procedure for managing allegations and concerns about adults.

- The School will determine whether the concern meets the relevant harm threshold and what action is required.
- Where appropriate, the School will liaise with the Local Authority Designated Officer (LADO), children's social care, police, DBS and/or the relevant professional regulator.
- The therapist must not attempt to investigate an allegation about themselves or another adult.
- The School may suspend or restrict access to pupils while safeguarding enquiries are undertaken, where this is considered necessary and proportionate.
- Where the concern relates to the Headteacher or another person for whom the normal reporting route is inappropriate, the concern must be escalated in accordance with the School's safeguarding policy and governance arrangements.

10. Confidentiality, Consent and Information Sharing

Therapeutic confidentiality is an important part of safe therapeutic practice but is not absolute. At the start of the therapeutic relationship, pupils should be given an age- and developmentally appropriate explanation of what will remain confidential and the circumstances in which information may need to be shared.

- Safeguarding information must be shared when necessary to protect a pupil or another person from harm.
- Data protection legislation must not be treated as a barrier to sharing information where lawful sharing is necessary to safeguard a child.
- Information sharing must be necessary, proportionate, relevant, accurate, timely and secure.
- Therapists must follow WhiteTrees School information governance and record-keeping procedures.
- Therapists must only share therapeutic information with parents/carers, social workers, school staff or other professionals where this is authorised, necessary and consistent with the pupil's rights, consent arrangements and safeguarding requirements.
- Where a pupil is looked after or subject to specific care arrangements, therapists must follow the School's agreed information-sharing and multi-agency arrangements, including liaison with relevant professionals where appropriate.

7a.Safeguarding During External Therapy Sessions and Therapeutic Interventions

- WhiteTrees School recognises that therapeutic sessions may require different levels of support and oversight depending on the individual needs, presentation, age, vulnerability and therapeutic intervention being provided to the pupil.
- To ensure that pupils remain safe while accessing external therapeutic support, the school will establish an appropriate level of support for each pupil and therapeutic intervention. This will be agreed between the relevant member of the school team, the external therapist and, where appropriate, the Designated Safeguarding Lead (DSL), Therapeutic Team and/or SENCO.
- Depending on the assessed needs of the pupil and the nature of the therapeutic intervention:
    - A designated tutor or appropriate member of the school team will support the pupil to attend and access their therapy session.
    - Where appropriate and agreed, the member of school staff will remain outside the therapy space for the duration of the session. This provides appropriate safeguarding oversight while maintaining the pupil’s privacy and allowing the therapist to establish an appropriate therapeutic environment.
    - Where a pupil requires a higher level of support due to their presentation, vulnerability, identified safeguarding concerns, emotional regulation needs or the nature of the intervention, an appropriate member of the school team may remain with the pupil throughout the session.
    - The level of staff presence will be determined on an individual basis and will be reviewed in response to changes in the pupil's needs, risk profile or therapeutic intervention.

- Where a member of school staff remains within the therapeutic space, the therapist should ensure that the pupil understands the purpose of their presence and that this does not unnecessarily compromise the therapeutic relationship or confidentiality.
- School staff supporting therapy sessions must maintain appropriate professional boundaries and must not interfere with or direct the therapeutic intervention unless there is an immediate safeguarding or safety concern.
- External therapists remain responsible for working within their professional competence and for raising any safeguarding concern, disclosure or significant change in presentation immediately in accordance with the school's safeguarding procedures.
- School staff supporting a pupil before, during or after a therapeutic session must report any safeguarding concern or significant change in presentation to the DSL or Deputy DSL without delay.
- Where a pupil does not attend a planned therapeutic session, the therapist and relevant school staff should follow the school's agreed procedures for recording and responding to non-attendance.
- The school will ensure that appropriate arrangements are in place for the safe transition of the pupil to and from the therapy session, including consideration of who is responsible for the pupil immediately before and after the session.
- Any decision regarding the level of staff presence should be proportionate to the pupil's needs and should balance safeguarding, therapeutic effectiveness, confidentiality, dignity and the pupil's wishes and feelings.

- The external therapist and school team should communicate appropriately regarding the pupil's engagement, attendance, presentation and any safeguarding concerns. Information shared should be necessary, proportionate and consistent with safeguarding requirements and the school's information-sharing procedures.
- The school retains overall safeguarding oversight for pupils attending therapy, regardless of whether the therapeutic provision is delivered by a member of school staff or an external professional. All staff and external professionals must therefore follow WhiteTrees School's safeguarding and child protection procedures and immediately escalate concerns to the DSL or Deputy DSL.

11. Therapeutic Records and Clinical Information

- Therapeutic records must be factual, professional, contemporaneous and stored securely.
- Safeguarding concerns must be recorded in accordance with the School's safeguarding recording system/process where the School requires this.
- Therapists must ensure that relevant information required for safe education, safeguarding, risk management and multi-agency planning is shared through the agreed School route.
- Therapists must not retain unnecessary copies of School safeguarding or pupil information on personal devices or unsecured systems.
- Records must be retained, accessed and disposed of in accordance with applicable law, professional requirements and WhiteTrees School information governance arrangements.

12. Professional Boundaries and Conduct

- Therapists must comply with the WhiteTrees School Staff Code of Conduct or equivalent expectations communicated to external practitioners.
- Personal relationships with pupils are prohibited.
- Therapists must not communicate with pupils through personal social-media accounts or personal messaging channels unless expressly authorised through an approved School system and professional arrangement.
- Any physical contact must be professionally appropriate, necessary and consistent with the pupil's needs, professional guidance and School expectations.
- Therapists must not take photographs, recordings or other personal data of pupils unless this is explicitly authorised and lawful.
- Any gifts, payments, expenses or other benefits involving pupils must be managed in accordance with School policy and professional standards.

13. Working with the School's Wider Safeguarding and Therapeutic Team

External therapists are expected to contribute appropriately to a coordinated, multi-disciplinary approach. Where lawful and necessary, this may include communication with the DSL, Headteacher, SENCO, pastoral/wellbeing staff, designated therapeutic leads, social workers, health professionals, parents/carers and other agencies.

- Therapeutic recommendations should be communicated through the School's agreed channels and should support the pupil's education, wellbeing and safeguarding.
- Where risk changes materially, the therapist must notify the appropriate School safeguarding promptly rather than waiting for a routine review.
- Therapists should participate in relevant review or multi-agency meetings where their professional input is required and appropriately authorised.
- Therapeutic interventions should be consistent with the pupil's identified needs, agreed plans and any relevant risk management arrangements.

14. Online and Remote Therapy

- Remote therapy must only be delivered through secure, School-approved or professionally appropriate platforms.
- The therapist must ensure that the environment is private and suitable for confidential therapeutic work.
- The therapist must establish the pupil's location at the start of the session where necessary for emergency safeguarding purposes.
- A clear process must be in place for responding to immediate risk, loss of contact or a safeguarding disclosure during an online session.

- Remote sessions must comply with the School's online safety, data protection and safeguarding requirements.

15. Whistleblowing and Raising Concerns

External therapists have a responsibility to raise concerns where they believe safeguarding arrangements, professional practice or leadership decisions may place pupils at risk.

- Concerns should normally be raised with the DSL, Headteacher or through the School's whistleblowing procedure.
- Where a concern cannot appropriately be raised internally, or where the individual believes it has not been acted upon appropriately, the therapist should use the relevant external safeguarding, regulatory or whistleblowing route.
- Nothing in this policy prevents a therapist from making a referral directly to children's social care, police or another appropriate authority where this is necessary to safeguard a child.

16. Breach of Policy

Failure to comply with this policy may result in action by WhiteTrees School, including restriction or termination of access to pupils, review or termination of the contractual arrangement, referral to the relevant professional or regulatory body, and/or referral to safeguarding authorities where appropriate.

17. Monitoring, Assurance and Review

- The School will maintain appropriate records demonstrating that external practitioners have completed required checks, induction and safeguarding requirements.
- The DSL and school leadership will monitor safeguarding concerns involving external practitioners and identify learning, themes or required improvements.
- Governance oversight will include appropriate consideration of safeguarding arrangements, policy effectiveness, safer recruitment, training, concerns and actions arising.
- This policy will be reviewed at least annually and sooner where there are changes to legislation, statutory guidance, professional regulation, School governance arrangements or following a significant safeguarding incident.

18. Related WhiteTrees School Documents

- WhiteTrees School Safeguarding Policy
- Safer Recruitment Policy and procedures
- Whistleblowing Policy
- Compliments and Complaints Policy
- Online Safety Policy
- Data Protection Policy

- Health and Safety Policy
- Relevant therapeutic, risk assessment and information-sharing procedures

Appendix A – Designated Safeguarding Lead and Key Contacts

The current DSL/DDSL names, school telephone numbers, email addresses, emergency contacts and relevant Local Authority/LADO details must be maintained in the School's safeguarding policy/DSL appendix and provided to external therapists as part of induction. This appendix should not be relied upon if it is not current.

Executive Head Teacher Laura Bull 01279 658518 Laura.bull@whitetrees-school.com DSL		**Head of Safeguarding** Lukas Bradon 01279 658518 Lukas.bradon@whitetrees-School.com Overall DSL	
Head Teacher Hannah Bonner 01279-658518 Hannah.bonner@whitetrees-School.com DSL	`	**Deputy Head** **The Mill** Nicole Balloqui Deputy 01279 723798 Nicole.balloqui@whitetrees-school.com DSL	
Deputy Head **Purley Farm** Ben Gray Deputy 01279 723798 Ben.gray@whitetrees-school.com DSL		**Deputy Head** **Woodlands** Joanne Gladstone Deputy 01279 723798 joanne.gladstone@whitetrees-school.com	

Lead Governor for Safeguarding Ayshea Praide Director of Children's Services 01279 685518 Ayshea.praide@whitetrees-group.co.uk
Hertfordshire Children's Services & MASH: **03001234043 protectedreferrals.cs@hertfordshire.gov.uk** **Local Authority Designated Officer (Hertfordshire's safeguarding children board):** Community Safety Lead: Bill Jephson, 03001234043 Head of CP: Roger Carruthers, 01992556937 Consultation Hub: 01438737511
Essex Children's Services: 0345 603 7627 or out of hours 0345 606 1212 Request support from us: Finding the right level of support for children and young people - Essex County Council
The Essex Education Safeguarding Team consists of: Jo Barclay, Head of Education Safeguarding and Wellbeing Matthew Lewis, Senior Education Safeguarding Adviser Alex Darvill – Senior Education Safeguarding Adviser

Appendix B – External Therapist Acceptance

I confirm that I have read, understood and agree to comply with the WhiteTrees School Safeguarding Policy for External Therapists and Counsellors, the School's relevant safeguarding procedures, and the professional standards applicable to my role. I understand that safeguarding concerns must be reported

without delay and that therapeutic confidentiality does not prevent necessary safeguarding information sharing.

- Name: _____
- Professional role / modality: _____
- Professional body / registration number: _____
- Organisation (if applicable): _____
- Signature: _____
- Date: _____