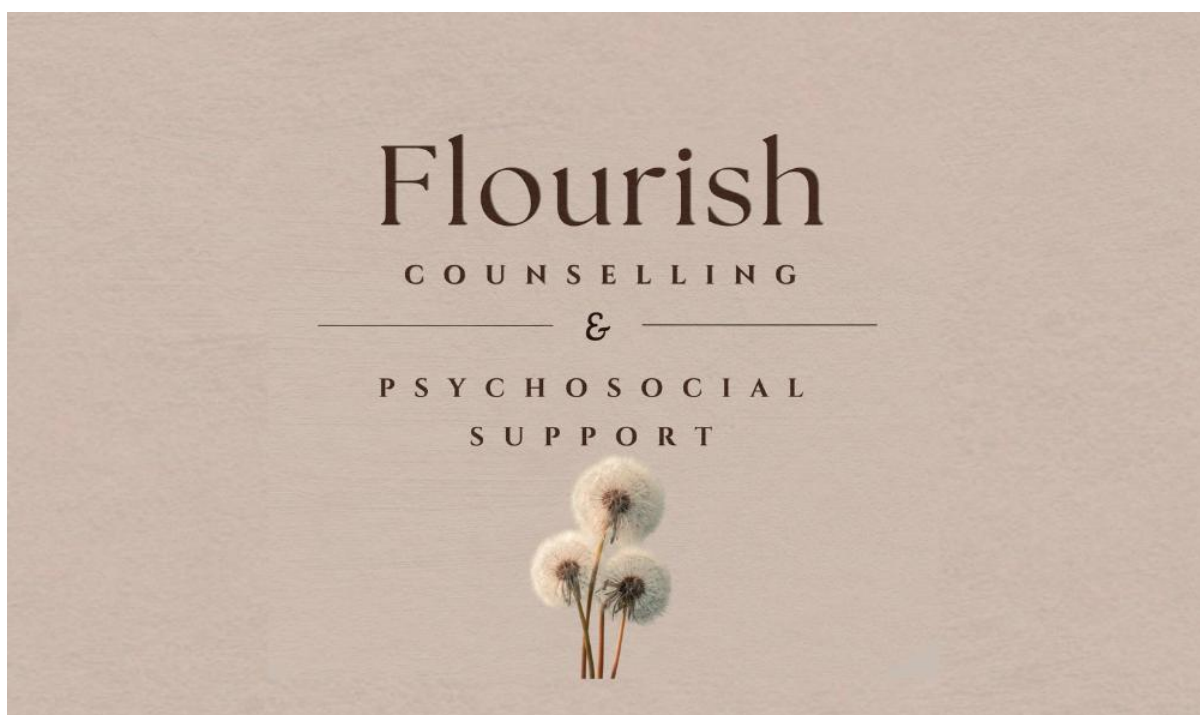


# Flourish Counselling & Psychosocial Support

Policy Handbook

2026



## Welcome to Flourish Counselling & Psychosocial Support!

This policy handbook provides information about the policies that guide my practice and support a safe, ethical, and effective counselling experience for all clients.

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## Policy 1: Privacy & Confidentiality Policy

### Flourish Counselling & Psychosocial Support

#### Purpose

This policy outlines how client confidentiality is protected and the circumstances under which information may be shared. It reflects my commitment to ethical, safe, and respectful counselling practice.

#### 1. My Commitment to Confidentiality

As a qualified counsellor working under professional ethical standards (e.g. ACA, PACFA) and I take your privacy seriously. Everything you share in session is treated as private and confidential. This applies whether we meet face-to-face or through telehealth.

#### 2. What Confidentiality Covers

Confidentiality applies to all personal information shared by clients, including:

- Name, address, contact details, and personal history.
- Issues discussed during sessions.
- Session notes, assessments, and records.
- Any communication (email, text, phone) related to therapy.

I will not disclose this information to anyone without your explicit, written permission — except in the specific cases outlined below.

#### 3. Exceptions to Confidentiality

There are legal and ethical limits to confidentiality. I may need to share information if:

- You disclose a serious risk of harm to yourself or someone else.
- You share information about a child or vulnerable adult at risk of harm.
- You are involved in or disclose acts covered by legal obligations to report (e.g. terrorism, drug trafficking, serious crime).
- A court of law legally requires me to disclose information.
- My supervisor needs to support me in working ethically and safely (your identity remains protected in clinical supervision).

Wherever possible, I will discuss this with you before breaching confidentiality unless doing so would increase any risk.

#### 4. Record Keeping and Storage

- I keep progress notes about each session. These help to guide our work and meet insurance and ethical requirements.
- Notes and personal information are stored securely, either in a locked cabinet (paper records) or in password-protected, encrypted digital files.
- Your information is not shared with anyone else unless you give permission or I am required to by law.
- Records are kept for 7 years after the end of counselling (or until a client turns 25 if they were under 18 when therapy began). This is in line with insurance guidance, the law and taxation purposes.

#### 5. Online & Remote Counselling

When working online, I take extra steps to maintain confidentiality:

- I use secure, encrypted platforms (e.g. Zoom Videoconferencing or Microsoft Teams).
- Sessions are held in a private, soundproof space within my home or my dedicated counselling office.
- You are encouraged to find a private space, too, and use headphones if needed.
- I do not record sessions unless we both agree and provide written consent.

## 6. Client Consent and Review

You will be given this policy and a counselling agreement before commencing counselling sessions. By signing the agreement, you confirm that you understand and accept these confidentiality terms.

This policy is reviewed annually or sooner if changes in law or ethical standards require it.

### Policy 2: Consent to Share Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines how and when client information may be shared with third parties, including allied health professionals, support coordinators, and funding bodies such as the NDIS. It reflects my commitment to ethical, transparent, and client-led collaboration.

##### 1. My Commitment to Informed Consent

As a trauma-informed counsellor, I believe that you have the right to control how your personal information is shared, and full autonomy will always be supported and encouraged. I will never disclose information without your explicit, informed, and written consent, unless required by law or ethical duty (see exceptions below).

##### 2. What Consent to Share Covers

Consent to share may apply to the following types of information:

- Session summaries or progress updates.
- Reports for NDIS reviews or allied health collaboration.
- Communication with support coordinators, psychologists, occupational therapists, GPs, or other professionals involved in your care.
- Invoices or documentation required by funding bodies (e.g. NDIS, Medicare, private health insurers).
- Any other information you specifically request to be shared.

You can choose what is shared, with whom, and for what purpose. You may also withdraw consent at any time.

##### 3. How Consent Is Obtained

- You will be asked to complete a Consent to Share Information form, specifying the details of the request
- I will clarify the purpose, scope, and limits of the information being shared.
- You may request to review any documents before they are sent.
- Consent forms are stored securely alongside your client records.

##### 4. Collaborative Practice with Allied Health, NDIS & Other Stakeholders

When working with other professionals or NDIS-funded services, I aim to support integrated care while protecting your privacy:

- I only share information that is relevant and necessary for your support goals.

- I avoid the use of jargon and ensure that shared documents reflect your voice and values.
- I do not share session notes unless specifically requested and consented to by you.
- I will always check in with you before responding to external requests to ensure your consent.

## 5. Exceptions to Consent

There are rare circumstances where I may need to share information without your consent:

- If there is a serious risk of harm to you or someone else.
- If a child or vulnerable adult is at risk.
- If legally required by a court or subpoena.
- If mandated by law, including serious criminal activity, any form of child abuse (physical, sexual, emotional, psychological), neglect, endangerment, exposure to family violence, or risk of significant harm.
- In clinical supervision (your identity remains protected).

Where possible, I will discuss this with you beforehand unless doing so would increase risk.

## 6. Record Keeping and Security

- All consent forms and shared documents are stored securely.
- Digital files are encrypted and password protected.
- Paper records are kept in a locked cabinet.
- Information is only shared via secure platforms or encrypted email, unless otherwise agreed.

## 7. Client Rights and Review

- You have the right to ask questions, limit what is shared, and withdraw consent at any time.
- This policy is reviewed annually or sooner if legal or ethical standards change.
- By signing the Consent to Share form, you confirm your understanding and agreement.

### Policy 3: Data Protection & Privacy Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy sets out how personal data is collected, stored, used, and protected in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). It ensures transparency, client safety, and legal compliance in handling sensitive information.

##### 1. Who I Am

Flourish Counselling & Psychosocial Support is a private counselling practice based in Australia. As a sole trader, I am the Data Controller and responsible for complying with Australian privacy legislation.

##### 2. What Personal Data I Collect and Why

I collect only the information necessary to provide safe, ethical, and effective therapy. This includes:

- Contact details: Name, phone number, email address, home address (for safety and communication).
- Emergency contact details (for safeguarding and crisis situations).
- Date of birth (for identification, age-appropriate care, and legal requirements).

- GP details (only used in a crisis or safeguarding situation).
- Relevant health information (e.g., mental health history, medication).
- Session notes: Brief factual notes of what is discussed in sessions.
- Assessment forms: Such as intake questionnaires or optional screening tools (e.g., SAST, CORE-10, DSM-5).
- Payment records (for accounting and tax purposes - these do not include card or bank details unless you consent to it during the intake process).

### 3. Lawful Basis for Processing

Under the Privacy Act 1988 (Cth), I process personal data using the following lawful bases:

- Contractual necessity: To deliver a counselling service you've requested.
- Legal obligation: For record-keeping, safeguarding, and tax compliance.
- Vital interests: Where needed to protect your life or someone else's.
- Legitimate interest: To maintain effective and safe counselling records.
- Explicit consent: For storing sensitive data and conducting therapy.

### 4. How Data is Stored and Protected

I take your privacy seriously. Data is stored securely in the following ways:

- Paper records (e.g., contracts, notes): Stored in a locked filing cabinet in my office.
- Digital files: Stored on an encrypted, password-protected device and backed up securely.
- Emails and texts: Used only for administrative purposes and stored on a password-protected phone and email account.
- Online forms: If used, are hosted on Australian privacy-compliant platforms.

I do not share your data with any third party unless required by law or with your written consent.

### 5. How Long I Keep Your Data

Client records are retained for 7 years from the end of counselling (or until age 25 for under-18s), in line with Australian health record retention laws. After this time, all data is securely shredded or deleted.

### 6. Your Rights Under Australian Privacy Law

As a client, you have the following rights:

- To be informed about how your data is used.
- To access the data I hold about you.
- To request correction of inaccurate information.
- To request deletion of your data, however, this may be limited by legal/insurance obligations.
- To restrict the processing of your data in certain situations.
- To object to how your data is processed.

Requests should be made in writing and will be responded to within 30 days, where legally and ethically possible.

### 7. Data Breach Procedure

In the unlikely event of a data breach (loss, theft, or unauthorised access), I will:

- Inform you as soon as possible.
- Notify the Office of the Australian Information Commissioner (OAIC) within 72 hours, if required.
- Take immediate steps to contain the breach and prevent further access.

## 8. Complaints

If you are concerned about how your data is handled, please speak to me first so I can address your concerns. You also have the right to contact the Office of the Australian Information Commissioner (OAIC) directly:

[The Privacy Act | OAIC](https://www.oaic.gov.au/privacy/privacy-legislation/the-privacy-act) - <https://www.oaic.gov.au/privacy/privacy-legislation/the-privacy-act>

## Review

This policy is reviewed annually or in response to legal or professional changes.

## Policy 4: Informed Consent Policy

### Flourish Counselling & Psychosocial Support

#### Purpose

This policy outlines how informed consent is obtained and maintained at **Flourish Counselling & Psychosocial Support**. It ensures that every client enters counselling voluntarily, with a clear understanding of the process, boundaries, and their rights and responsibilities.

#### 1. What is Informed Consent?

Informed consent means that you, as the client, agree to take part in counselling, having been fully informed of:

- What counselling involves.
- What you can expect from me as your counsellor.
- What I expect from you as a client.
- The limits of confidentiality.
- How your personal data is handled.
- Your right to ask questions, withdraw consent, or end counselling at any time.

It is both a **legal** and **ethical** requirement and a fundamental part of creating a safe, collaborative therapeutic relationship.

#### 2. How Informed Consent is Obtained

Before counselling begins, I provide all new clients with the following:

- A **written Counselling Agreement** outlining the practical and therapeutic terms of working together.
- This includes session details, fees, cancellations, confidentiality, record-keeping and client rights.
- You are invited to ask any questions and to take time to review the documents.
- Consent is confirmed when you sign the intake documents, either in person or electronically.

#### 3. Ongoing Consent

Informed consent is not a one-off event. It is a continuing process:

- I check in regularly to ensure you feel comfortable with how counselling is progressing

- You are free to ask questions or raise concerns at any point
- If anything changes (e.g. new issues, changes in risk, or format of sessions), we will revisit and, if needed, update the consent agreement
- You can withdraw consent and end counselling at any time without needing to give a reason

#### 4. Consent for Specific Situations

Additional or specific consent will be sought for the following:

- If we use **assessment tools** (e.g. questionnaires, screening tools)
- If sessions are ever to be **audio recorded** for supervision or training (only with your written permission)
- If **online sessions** are offered and you agree to that format
- If I need to **share information** with another professional (e.g. GP or safeguarding service) — this would be discussed and agreed upon unless it's an emergency

#### 5. Consent for Clients Under 18 (if applicable)

If I work with children or young people, consent is usually required from a parent or guardian, unless the young person is deemed competent and able to make their own decisions about counselling. This will be handled carefully, with attention to safeguarding and ethical guidance.

#### 6. Consent and Power

As a counsellor, I am especially mindful of the power dynamics in counselling. My role is not to direct or instruct, but to **support and empower you**. Informed consent helps ensure that you retain agency, choice, and dignity throughout the counselling process.

#### 7. Documentation and Storage

- Signed counselling agreements and consent forms are stored securely
- These are kept for 7 years in line with insurance requirements and Australian Law
- You may request a copy of your agreement at any time

#### Review of Policy

This policy is reviewed annually or sooner if legal, ethical, or practical requirements change.

#### Policy 5: Safeguarding Policy

##### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines the safeguarding responsibilities at **Flourish Counselling & Psychosocial Support**. It ensures that any concerns about the safety or well-being of clients, including children, vulnerable adults, and others at risk, are recognised and responded to appropriately and in line with legal and ethical obligations.

##### 1. Safeguarding Commitment

As a qualified, insured and accredited counsellor, I am committed to promoting the safety, dignity, and well-being of every client. I have a duty of care to act when there are concerns about harm or abuse, whether this affects the client directly or someone they disclose is at risk.

This duty extends to work with adults and children, both in face-to-face and remote sessions.

##### 2. Who Is Protected by This Policy?

This safeguarding policy applies to:

- Adult clients.
- Children and young people (under 18).
- Vulnerable adults (those who may be unable to protect themselves due to age, disability, mental health, or other factors).
- Any third party you disclose as being at risk (e.g. a child in your care).

### 3. Types of Harm or Abuse Recognised

I am trained to recognise and respond to various forms of abuse, including:

- Physical abuse.
- Sexual abuse or exploitation.
- Emotional or psychological abuse.
- Neglect or self-neglect.
- Financial or economic abuse.
- Domestic abuse (including coercive control).
- Organisational or institutional abuse.
- Discriminatory abuse.
- Modern slavery or trafficking.

### 4. How Concerns Are Raised

Safeguarding concerns may arise in several ways:

- You tell me that you or someone else is at risk of harm.
- I observe signs of distress, injury, or unusual behaviour.
- You disclose historical abuse that may involve a risk to others.
- You report suicidal thoughts, self-harm, or thoughts of harming someone else.
- A third party (e.g. a family member) contacts me with concerns (this will be discussed with you, and your confidentiality will be maintained).

### 5. My Actions When a Safeguarding Concern Arises

If I become concerned about your safety or someone else's, I will:

1. **Talk to you first**, wherever possible, to explain my concerns and what action may be required by law.
2. **Consult my supervisor** to ensure that the decision I make is ethical, proportionate, and in line with best practice standards.
3. If necessary, **contact relevant authorities** (e.g. GP, emergency services, DHHS, safeguarding board).
4. **Record the concern** factually, clearly, and promptly in a secure format.

I will always aim to involve you in the process unless doing so would increase risk.

### 6. Confidentiality and Safeguarding

Confidentiality is vital in counselling, but it is not absolute. If you disclose something that poses a serious risk to yourself or others, I may need to share that information to protect you or other people. I will explain this clearly and only share the minimum necessary information to mitigate risks of harm.

### 7. Working with Children or Young People (if applicable)

- I will require parental consent before beginning work with clients under 18.
- I use age-appropriate methods and explanations about confidentiality.
- I liaise with parents or guardians appropriately, maintaining the child's trust and safety.
- I follow the local safeguarding children's guidance where needed.

### 8. Training and Supervision

- I undertake regular safeguarding training as required by my professional accreditation body.
- I discuss safeguarding matters in supervision to ensure safe and ethical practice is upheld.
- I stay up to date with changes in safeguarding laws and guidance regularly.

### 9. Emergencies

In a crisis or emergency (e.g. risk of immediate harm, suicidal intent with a plan), I may:

- Contact emergency services (000).
- Notify your GP or crisis team.
- Contact the emergency contact you've provided, if appropriate.

### 10. Review and Compliance

This policy is reviewed annually, or sooner if required by changes in legislation or professional guidance.

## Policy 6: Clinical Notes & Record Keeping Policy

### Flourish Counselling & Psychosocial Support

#### Purpose

This policy explains how client records are created, maintained, stored, and destroyed in line with legal, ethical, and professional standards. It ensures that all documentation at **Flourish Counselling & Psychosocial Support** protects client confidentiality and supports effective and accountable counselling practice.

#### 1. Types of Records Kept

I keep the following types of records as part of my counselling practice:

- Client contact details (name, phone, email, address, GP, emergency contact).
- Signed counselling agreement and informed consent form.
- Session notes – factual, non-interpretive summaries of themes discussed, risk indicators, and significant changes.
- Assessment tools (e.g. SAST, LASA, CORE-10), if used, and your responses.
- Any correspondence relevant to the therapeutic process (e.g. emails arranging sessions).

I do not audio or video-record sessions unless explicitly agreed in writing, and this would only occur for supervision or training purposes, with your full consent.

## 2. Purpose of Note-Keeping

Clinical notes serve the following purposes:

- To support continuity of care.
- To plan future sessions with you that provide the maximum benefit to your care.
- To monitor therapeutic progress and maintain accountability.
- To help with clinical supervision and ethical decision-making.
- To meet professional insurance and legal requirements.

Notes are not detailed transcripts. They are brief and factual, avoiding judgmental or diagnostic language.

## 3. How Records Are Stored

Records are securely stored to protect your confidentiality:

- **Paper records** (e.g. signed contracts, handwritten notes) are kept in a locked filing cabinet in my secure office.
- **Digital records** (e.g. electronic notes or assessments) are stored on password-protected, encrypted devices or cybersecurity-compliant cloud storage.
- **Any emails or text messages** are used only for administrative purposes and are stored on a password-protected device and/or email account.

Access to records is limited to me as the sole practitioner, except when legal requirements or serious risk demand disclosure.

## 4. How Long Records Are Retained

Client records are retained for:

- **7 years** after the final session (for adults)
- **Until age 25** if the client was under 18 when therapy began  
This is in accordance with the requirements of professional insurance providers and ethical guidance.

After this period, records are securely destroyed by shredding (paper) or permanent digital deletion.

## 5. Client Access to Records

You have the right to:

- Request a copy of the data I hold about you.
- Ask for inaccurate information to be corrected.
- Request deletion of some or all of your data (within legal and insurance limits).

Requests will be responded to within 30 days, subject to any legal exemptions.

## 6. Sharing of Records

I will not share your records with any third party without your written consent, except:

- If legally required (e.g. court order).
- If necessary to protect you or someone else from serious harm.
- If I am working jointly with another professional and we've agreed to a shared care plan (with your permission).

## 7. Use in Supervision

I discuss client work anonymously with my clinical supervisor to support ethical practice. Notes may be referred to during supervision but are never shared directly.

## 8. Policy Review

This policy is reviewed annually or in response to changes in legal, ethical, or professional requirements.

### Policy 7: Complaints Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy sets out how clients can raise concerns or complaints about their counselling experience at **Flourish Counselling & Psychosocial Support**, and how these will be handled. It ensures that clients feel safe to speak up and that feedback is taken seriously, respectfully, and professionally.

##### 1. My Commitment to You

At **Flourish Counselling & Psychosocial Support**, I am committed to providing high-quality professional care. I value open, honest feedback and will always aim to respond to any concerns in a fair, non-defensive, and respectful way. Complaints are opportunities for reflection and growth.

##### 2. What Is a Complaint?

A complaint is any expression of dissatisfaction or concern about:

- The counselling process or relationship.
- My conduct or communication as your counsellor.
- Professional boundaries or ethical concerns.
- Practical arrangements (e.g. session timing, cancellations, fees).

You do not need to use the word “complaint” for your concerns to be heard and taken seriously.

##### 3. How to Raise a Concern or Complaint

There are several ways to raise a concern:

###### Step 1: Raise It Informally (If You Feel Safe to Do So)

- You are encouraged to speak to me directly, in person or via email.
- I will listen with care, avoid defensiveness, and work with you to find a resolution.
- If we resolve the issue informally, no formal record will be made unless you request one.

###### Step 2: Formal Complaint to Me

If the issue is not resolved or you prefer a formal route, you can submit a written complaint by email or post. Please include:

- A clear description of the issue.
- When it happened.
- How it has affected you.
- What outcome you are seeking.

I will:

- Acknowledge your complaint within 5 working days after written receipt.
- Offer a meeting (in person, online or over the phone) to explore the issue if appropriate.
- Provide a written response within 14 working days of the meeting or receipt of the complaint.
- Keep a confidential record of the complaint and response.

### **Step 3: External Complaint to My Professional Body**

If you are dissatisfied with how I handle the complaint, or you believe there has been a breach of ethical standards, you have the right to contact my professional membership body.

I am a member of the **Australian Counselling Association**, and you may contact them directly using their formal complaints process. I will provide you with my membership number and relevant contact details upon request.

## **4. Safeguarding Concerns**

If your concern relates to serious misconduct, abuse, or a safeguarding issue, you may contact the appropriate authority directly. This may include:

- DHHS.
- The Police (for criminal matters).
- The Office of the Australian Information Commissioner (OAIC) - for data breaches.

## **5. Confidentiality**

All complaints are handled confidentially. However, I may need to discuss them with my supervisor or professional body if the matter involves ethical or legal considerations.

## **6. No Negative Consequences**

Making a complaint will never result in you being treated differently or being denied counselling. You are entitled to express your concerns without fear of judgment or retaliation.

## **7. Policy Review**

This policy is reviewed annually or following any complaint that suggests changes are needed.

## **Policy 8: Cancellation & Refund Policy**

### **Flourish Counselling & Psychosocial Support**

#### **Purpose**

This policy sets out clear guidance on cancelling sessions, late attendance, and refunds. It supports mutual respect, protects time boundaries, and ensures the smooth running of my counselling practice.

#### **1. Booking Sessions**

- Sessions are usually booked weekly, fortnightly, or as agreed in advance.
- You can book or amend sessions by email, phone, or in person with 42 hours' notice.
- Regular time slots may be reserved for ongoing clients, depending on availability. We will inform you if this is the case.

#### **2. Cancellation by the Client**

If you need to cancel or reschedule a session:

- Please provide at least 48 hours' notice.

- You can cancel via email, text or phone.

**If less than 48 hours' notice is given:**

- The full session fee will be forfeited unless the cancellation is due to a very serious illness, accident, or emergency.
- If you cancel late more than once, we may review how we manage future sessions.

**Missed sessions without notice (no-show):**

- The full fee **will be charged**, except in exceptional circumstances.
- If you do not attend and do not contact me, I will try to follow up once, and if no response is received, I may assume you wish to pause or end counselling.

**3. Cancellation by the Practitioner**

If I need to cancel a session due to illness, emergency, or other unforeseen commitments:

- I will give you as much notice as possible (by phone, text, or email).
- I will offer to reschedule or defer the session.
- No fee will be charged for sessions I cancel, or in the case that the fee is already paid, I will credit this amount toward your next session.

**4. Late Arrivals**

- If you arrive late for a session, the session will still end at the scheduled time.
- The full fee is payable even if the session is shortened due to late arrival.
- If I am running late due to an unavoidable situation, I will make every effort to give you your full session time or reschedule if needed.

**5. Refunds**

Refunds apply only in specific cases:

- If you cancel a prepaid session with more than 42 hours' notice
- If I cancel a session that you've already paid for.
- If you mistakenly overpay.

**Refunds are not issued for:**

- Missed sessions without notice.
- Late cancellations within the 42-hour window (unless an exception is agreed upon).
- Partially used counselling packages or block bookings after work has started.

Refunds will be issued by the same payment method you used and processed within 5 working days, where practical.

**6. Exceptions and Compassionate Grounds**

I understand that life is unpredictable. If you experience a genuine emergency or crisis, please contact me as soon as you are able. I will always consider compassionate circumstances and aim to respond with understanding.

**7. Review and Agreement**

This policy is included in the counselling agreement, which clients are asked to read and sign. It may be adapted for specific client needs (e.g. long-term illness or irregular shift patterns).

This policy is reviewed annually.

## Policy 9: Fees & Payment Policy

### Flourish Counselling & Psychosocial Support

#### Purpose

This policy provides clear and transparent information about counselling session fees, payment options, and any concessions available. It ensures mutual respect and financial clarity between the counsellor and client.

#### 1. Standard Fees

- The current standard fee for individual counselling sessions is **\$144 per 50-minute session**.
- For couples therapy, the fee is **\$195 per 50-minute session**.
- For NDIS sessions, please refer to the NDIA website for current pricing arrangements.
- Fees are reviewed annually. Any planned changes will be communicated in advance.

#### 2. Concessionary Rates

**Flourish Counselling & Psychosocial Support** seeks to make counselling accessible. I offer a limited number of concessionary spaces for:

- Students.
- Low-income individuals.
- Unemployed clients.
- Clients referred by charitable agencies.

These are offered on a sliding scale, discussed and agreed upon in advance. Concessions are reviewed every 3 months based on your circumstances and my availability.

#### 3. Payment Methods

- **Bank transfer** is the preferred method for counselling sessions and is accepted in advance of the session.
- **Cash payments** may be accepted for in-person sessions by prior agreement.
- **Card payments** are accepted and can be paid in person or via our online secure payment system.
- I do not currently accept cheques as a form of payment.

All sessions are to be paid **within 24 hours** of the scheduled session time. Your session fees will be automatically deducted from our payment system.

#### 4. Payment Timing

- Payment is preferred **the day before your session**.
- If you wish to pay in advance for several sessions, this can be arranged by agreement.

#### 5. Missed Payments

- If payment is missed, I will send a gentle reminder by email or text. These are automated through our payment system.
- Repeated missed payments will lead to a pause in counselling until the balance is cleared.
- I will always aim to work compassionately with you to address financial difficulties if they arise.

## 6. Block Bookings

Block bookings (e.g. paying in advance for 4–6 sessions) are optional and non-refundable once counselling begins, except in cases of the counsellor's unavailability or in exceptional circumstances.

## 7. Invoices and Receipts

Receipts are available upon request. If you require a formal invoice (e.g. for insurance or reimbursement purposes), please let me know in advance.

## 8. Ending Therapy and Outstanding Fees

Before counselling ends, all outstanding balances must be settled. If counselling ends unexpectedly, I will contact you with a summary of any unpaid sessions that are due.

## 9. Policy Review

This policy is reviewed annually or if payment systems change. Any updates will be clearly communicated to existing clients.

## Policy 10: Health & Safety Policy

### Flourish Counselling & Psychosocial Support

#### Purpose

This policy sets out how **Flourish Counselling & Psychosocial Support** maintains a safe, clean, and comfortable environment for both face-to-face and remote counselling sessions. It is designed to protect the health, safety, and well-being of all clients and the practitioner.

#### 1. My Commitment to Health and Safety

As a self-employed counsellor working from my office, I am committed to taking all reasonable steps to ensure a safe environment for counselling. This includes physical safety, emotional safety, hygiene, and emergency preparedness.

#### 2. Description of the Therapy Space

- My counselling practice is located in a **dedicated office**.
- Access is via a well-lit entrance.
- The room is furnished with comfortable seating, appropriate lighting, and ventilation.
- The space is free from hazards and cleaned regularly to maintain a hygienic environment.

#### 3. Physical Accessibility

- Clients are advised in advance if access involves stairs and may not be suitable for those with limited mobility.
- I will work with clients to find suitable alternatives where accessibility is an issue (e.g. in the downstairs boardroom that supports those with limited mobility).

#### 4. Hygiene and Infection Control

- The counselling space is cleaned and ventilated between sessions.
- Hand sanitiser and tissues are provided.
- If either the client or counsellor is unwell or experiencing symptoms of contagious illness (e.g. cold, flu, COVID-19), sessions may be rescheduled or moved to telehealth.
- Surfaces are regularly disinfected, especially high-contact areas like door handles, seats and sensory objects made available.

## 5. Emergency Preparedness

- In the event of a fire, clients will be directed to exit through the safest route (the main entrance or alternate fire exit if applicable).
- A first aid kit is available on-site.
- Emergency contact details for each client are kept securely and accessed only if needed in a crisis.

## 6. Lone Working and Personal Safety

- If I work alone, I have a lone-working protocol in place, including safety check-ins with other businesses in the building and personal safety measures.
- All new clients are risk-assessed during the initial contact to identify any potential safety concerns.
- If I ever feel unsafe during a session, I reserve the right to end the session and seek support through my emergency alert device.

## 7. Client Behaviour and Boundaries

- Clients are asked to respect the counselling space and always maintain appropriate behaviour.
- Aggressive, threatening, or intoxicated behaviour will not be tolerated and may lead to immediate termination of the session and/or ongoing counselling.

## 8. Remote Work and Safety

For online sessions:

- I work from a quiet, private room with a secure internet connection.
- You are encouraged to find a similarly private and comfortable space, free from distractions and interruptions.
- In case of emergencies during online sessions, I will use your provided location and emergency contact if needed to notify emergency services.

## 9. Accidents and Incidents

- Any accidents or incidents that occur during a session (e.g. trip, fall, fainting) will be recorded in an incident log.
- Appropriate medical help will be sought if necessary.
- Clients will be informed of any issues that may impact their safety during future visits.

## 10. Review

This policy is reviewed annually and updated in line with changes in health and safety guidance, including public health updates.

### Policy 11: Online/Remote Counselling Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines the procedures for offering, managing, and safeguarding online and telephone counselling sessions at **Flourish Counselling & Psychosocial Support**. It ensures that remote counselling is provided ethically, securely, and in a way that respects client confidentiality and well-being.

##### 1. My Commitment to Safe and Effective Remote Counselling

As a qualified counsellor, I offer online and telephone counselling to extend access to support in a way that fits clients' needs and circumstances. I aim to create the same level of safety, professionalism, and connection online as I do in person.

## 2. Platforms Used

I offer online counselling via secure, cyber-secure and compliant platforms such as:

- **Zoom Videoconferencing** (password settings enabled).
- **Microsoft Teams** or other encrypted browser-based platforms (no downloads required).
- Telephone counselling is an alternative if you prefer not to use video.

Before sessions begin, I will agree with you on which platform we'll use and provide the necessary access links or instructions.

## 3. Your Environment for Online Sessions

To get the most from therapy, you are encouraged to:

- Choose a **private, quiet, and comfortable space**.
- Use **headphones** for privacy if others are nearby.
- Silence notifications and avoid multitasking during the session.
- Have a stable internet connection and a device with working video/audio.

If privacy is not possible at home, we can discuss alternative times or formats.

## 4. My Environment

I conduct online sessions from my secure, private counselling office. The space is:

- Soundproofed and free from interruption.
- Equipped with a stable internet connection.
- Protected by antivirus software and strong passwords.
- Reserved exclusively for counselling work during sessions.

## 5. Emergencies and Risk in Remote Work

- At the start of counselling, I will ask you for your **current location** (especially for video sessions) and an **emergency contact person**.
- If I believe you are at immediate risk during a session, and you become unresponsive or distressed, I may contact emergency services using the information you provided.
- You are encouraged to speak openly about any suicidal thoughts, self-harm, or emotional distress so that we can make a joint safety plan.

## 6. Technology Failures

In the event of:

- **Loss of connection**, I will try to reconnect for up to 10 minutes.
- If we cannot reconnect, I will **call you** to either continue by phone or rearrange the session.
- **You will not be charged** for any time lost due to technical problems on my end.

You are encouraged to let me know if you are having repeated technical issues that affect your ability to engage in therapy.

## 7. Consent for Online Work

- Before starting remote counselling, you will receive a written agreement that outlines how online counselling works, including privacy, platform choice, risks, and boundaries.
- By signing the agreement, you give your informed consent to engage in remote sessions.
- You may switch to in-person sessions if/when appropriate and available, and vice versa.

## 8. Suitability for Online Counselling

Not all issues or situations are suitable for remote work. If your situation involves high risk, crisis, or complex trauma, I may recommend in-person support or specialist services. We will always make this decision together with your safety in mind.

## 9. Confidentiality in Online Sessions

- Sessions are never recorded without your written consent.
- I take care to always maintain privacy and discretion.
- You are responsible for maintaining confidentiality on your side of the call (e.g. using headphones, speaking in a safe space).

## 10. Review of Policy

This policy is reviewed annually or in response to changes in technology, ethical guidance, or client needs.

### Policy 12: Technology & Disruption Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy sets out how technical issues and disruptions are managed during online or telephone counselling sessions. It ensures that both client and counsellor are prepared for unexpected interruptions and can maintain therapeutic continuity and emotional safety.

### 1. Commitment to Reliable Remote Sessions

At **Flourish Counselling & Psychosocial Support**, I aim to provide stable, confidential, and consistent online counselling sessions. However, as with all technology, interruptions can occasionally occur. This policy outlines how we will respond when they do.

### 2. Potential Disruptions

Disruptions may include:

- Loss of internet or Wi-Fi signal.
- Audio or video freezing or failing.
- Power cuts.
- Device malfunction.
- Unexpected interruptions (e.g. family members entering the room, background noise).

These can affect either your equipment or mine, and this policy covers both situations.

### 3. My Responsibilities

I will take the following steps to ensure technical reliability:

- Use a secure, high-speed internet connection.

- Use an encrypted and up-to-date video conferencing platform (e.g. Zoom Videoconferencing or Microsoft Teams).
- Keep my devices charged, updated, and maintained.
- Work in a quiet, private, and interruption-free room.
- Have a backup device or method ready if needed.
- Test connections before each session.

#### 4. Your Responsibilities

To help sessions run smoothly, you are encouraged to:

- Ensure your device is fully charged or plugged in.
- Check that your internet connection is stable.
- Use a secure, private space with minimal background noise.
- Close other apps or tabs to improve performance.
- Let me know in advance if you anticipate any connectivity issues.

We will agree on a preferred back-up method (e.g. phone call) in case of disconnection.

#### 5. What Happens if the Session Is Interrupted

**If the connection drops:**

- I will wait and attempt to reconnect for up to **10 minutes**.
- If we cannot reconnect, I will phone or message you to decide whether to:
  - a) Continue by phone
  - b) Reschedule the remainder of the session
  - c) End early without charge if the issue is on my end.

**If your connection drops:**

- You are welcome to reconnect within 10 minutes if you are able.
- If you are unable to continue, we will arrange a suitable solution together.

#### 6. Fees and Time Lost

- If the disruption is due to my technical failure, **you will not be charged** for the lost session time.
- If the disruption is due to your equipment or connection, and we cannot complete the session, the standard fee **may still apply**, depending on the circumstances.
- I always aim to be fair and flexible in genuine emergencies or unforeseen circumstances.

#### 7. Unexpected Interruptions

If an unplanned interruption occurs (e.g. someone enters the room), we may:

- Pause the session and resume once privacy is restored.
- Mute video/audio until the situation is resolved.
- End or reschedule if necessary to protect your privacy.

#### 8. Contingency Planning

We will agree at the outset:

- A back-up **contact number**.
- Whether we are happy to switch to a phone call mid-session if needed.
- What action I can take in the event of a **crisis**, or if you become unresponsive during a disruption (e.g. contacting emergency services).

## 9. Review of Policy

This policy is reviewed annually or following a significant technical issue or change in practice.

### Policy 13: Location & Emergency Contact Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines how location and emergency contact details are collected and used during counselling, especially for remote sessions. It ensures that, in the event of a crisis or safeguarding concern, **Flourish Counselling & Psychosocial Support** can respond appropriately to protect your safety and wellbeing.

##### 1. Why This Information Is Collected

As your counsellor, I have a duty of care to safeguard you and others from risk or harm. Knowing your current location and having an emergency contact on your file enables me to respond quickly and appropriately in situations such as:

- You become unwell or distressed during a session.
- A safeguarding concern or mental health emergency arises.
- A technology disruption (if session is telehealth) where you appear at risk and become uncontactable.

This information is not used unless necessary and is stored securely.

##### 2. What Information Is Collected

When therapy begins, I will ask you to provide:

- Your **current address** (for remote sessions, this must be updated if your location changes).
- A **nominated emergency contact person** – usually a family member, trusted friend, or GP.
- Their full name, relationship to you, and contact number.
- Your **GP's name and practice details** (especially if there are mental health, medical, or safeguarding concerns).

##### 3. How This Information Is Used

I may use your emergency information only in the following situations:

- You become unresponsive or end the session in distress, and I am seriously concerned for your safety.
- You disclose intent to harm yourself or another person, and I believe urgent action is needed.
- A serious safeguarding concern arises involving you or a third party (e.g. a child or a vulnerable adult).
- Emergency services need to be directed to your location.

In these cases, I will always attempt to speak with you first before taking any action, unless doing so would increase the risk.

##### 4. Confidentiality and Storage

- Your emergency contact and location details are stored securely (either in encrypted digital files or a locked storage cabinet).
- This data is not shared unless there is a clear, immediate risk or legal duty to do so.
- Emergency contact details are reviewed and updated regularly, particularly for long-term clients or those who move location.

## 5. Online Sessions and Crisis Protocol

For online sessions, I ask you to:

- Confirm your **exact location at the start of each session** (especially if using a mobile device or travelling).
- Inform me if your location changes between sessions.
- Keep your emergency contact details up to date.

In case of a crisis during an online session:

- If you disconnect suddenly, and I am concerned for your welfare, I will attempt to reconnect.
- If reconnection is not possible and you are at risk, I may contact your emergency contact or local emergency services using the information you provided.

## 6. Your Rights

- You have the right to know why this information is collected and how it will be used.
- You may request to update or change your emergency contact at any time.
- You may withdraw consent for sharing information in non-emergency situations, though legal limits still apply in emergencies or safeguarding cases.

## 7. Review of Policy

This policy is reviewed annually or sooner if changes in practice, law, or client needs arise.

### Policy 14: Supervision Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines the role of clinical supervision within **Flourish Counselling & Psychosocial Support**. It ensures that all counselling work is carried out safely, ethically, and in line with professional guidelines. Supervision supports the quality of care I provide to clients and helps me reflect on my practice in a safe and structured way.

### 1. What Is Supervision?

Supervision is a formal, confidential space where a counsellor discusses their client work with a trained and experienced supervisor. All professional counselling bodies require supervision to maintain accreditation. Supervision plays a key role in:

- Enhancing client safety and care.
- Supporting counsellor wellbeing and professional development.
- Ensuring ethical and competent practice.
- Providing accountability for difficult decisions or ethical dilemmas.

### 2. My Supervision Practice

As a registered counsellor, I attend regular clinical supervision in line with the ethical guidelines of my professional membership body (e.g. ACA or PACFA). This means:

- I meet with my supervisor at least once a month or have 1 hour of clinical supervision per 20 client contact hours.
- I take anonymised information from some client sessions to reflect on clinical issues, ethical challenges, and client progress.
- I work with a qualified supervisor accredited with The Australian Counselling Association, who adheres to the same professional standards and confidentiality expectations that I do.

### 3. Confidentiality in Supervision

All client material shared in supervision is kept anonymous. This means:

- I do not share your full name or any identifying details.
- I may refer to the themes of our work, therapeutic challenges, counselling modalities I use or would be beneficial, or clinical decisions I'm considering.
- Supervisors are bound by the same duty of confidentiality and will not disclose information unless there is a serious risk or legal obligation to do so.

Supervision ensures that I stay professionally accountable and that my work with you is as effective and safe as possible.

### 4. Why Supervision Matters to You as a Client

Supervision protects your best interests by:

- Offering a second, seasoned perspective on how to best support you.
- Helping me stay grounded, ethical, and responsive to your needs.
- Providing space to check that counselling remains safe and appropriate.
- Reducing the risk of counsellor burnout and fatigue, which helps to ensure consistent care is provided to you.

### 5. Dual Roles and Boundaries

If you are known to my supervisor in any way (e.g. they work in your community, etc), I will not bring your material without your consent. If needed, I will consult a different supervisor or anonymise your case more heavily.

### 6. Review of Policy

This policy is reviewed annually or in response to changes in ethical guidance or supervisory practice.

#### Policy 15: Insurance Policy Details

##### Flourish Counselling & Psychosocial Support

###### Purpose

This policy outlines the professional insurance arrangements in place at **Flourish Counselling & Psychosocial Support**. It ensures that clients are protected in the unlikely event of a professional, legal, or ethical concern and that counselling services are delivered in line with regulatory and industry standards.

#### 1. Professional Indemnity and Public Liability Insurance

I hold comprehensive insurance coverage that includes the following:

### Professional Indemnity Insurance

- This protects both my clients and me in the event of a claim arising from professional services provided, including allegations of negligence, breach of confidentiality, or errors in practice.
- It ensures that legal costs, settlements, or compensation (if ever required) are handled through my insurer.

### Public Liability Insurance

- Protects against accidental injury or property damage that may occur on my premises (e.g., slips, trips, falls).
- Covers visitors and members of the public who may be affected while on site or during community-based sessions.

## 2. Scope of Cover

### Professional Indemnity Insurance covers:

- Face-to-face counselling and psychosocial recovery coaching sessions.
- Non-face-to-face work such as documentation, assessments, report writing, and clinical formulation.
- Online and telephone sessions (including international clients, where legally permissible).
- Work with elders, adults, children, and young people.
- Confidential record-keeping, case notes, assessments, and reporting.

### Public Liability Insurance covers:

- Accidental injury occurring on my premises or during community-based sessions.
- Accidental damage to a visitor's property while attending an appointment.

## 3. Reporting an Issue or Claim

If a client believes that harm has been caused by my counselling work and wishes to explore a formal complaint, they may:

- Contact me directly to discuss the issue.
- Make a formal complaint to my professional body (e.g. ACA or PACFA).
- If legal advice or action is taken, my insurance provider will be notified and will take over the handling of any claims.

If legal action or a formal claim is initiated, my insurance provider will be notified and will take over the handling of any claims. My aim is always to address concerns compassionately and responsibly before formal procedures are needed.

## 4. Ongoing Professional Responsibility

As part of maintaining insurance, I am required to:

- Work within the limits of my competence and training.
- Follow ethical and legal standards in practice.
- Maintain ongoing professional development (OPD).
- Notify my insurer promptly of any incidents or concerns that may give rise to a claim.

## 5. Review of Policy

This insurance policy is reviewed and renewed annually to ensure continuous coverage. Any changes in provider or coverage are communicated to clients if required.

## Policy 16: Ethical Framework Alignment Statement

### Flourish Counselling & Psychosocial Support

#### Purpose

This statement outlines the ethical principles and professional standards that underpin all counselling services at **Flourish Counselling & Psychosocial Support**. It affirms my commitment to integrity, safety, professionalism, and the welfare of every client.

#### 1. Ethical Membership and Standards

I am a registered member of the Australian Counselling Association (ACA), and I adhere to the **ACA Code of Ethics and Practice**. This includes:

- Respecting client autonomy and dignity
- Maintaining confidentiality and trust
- Working within my competence and scope
- Practising with honesty, care, and professionalism
- Engaging in regular supervision and ongoing professional development
- Being accountable for the quality and safety of my work

A copy of the ACA Code of Ethics and Practice is available on request or via the ACA website: <https://theaca.net.au/>

#### 2. Core Values Guiding My Practice

The ethical framework I follow includes key values that guide my work:

- **Autonomy:** I respect your right to make your own choices and decisions.
- **Beneficence:** I seek to promote your well-being and best interests.
- **Non-maleficence:** I commit to doing no harm.
- **Justice:** I treat every client fairly and without discrimination.
- **Fidelity:** I work to build trust and honour my professional obligations.
- **Self-respect:** I take care of my own well-being and maintain professional boundaries.

#### Flourish Counselling & Psychosocial Support's Practice Values

Alongside these ethical principles, my practice is grounded in the values of:

- **Inclusion** – welcoming all identities, cultures, and lived experiences.
- **Acceptance** – meeting clients where they are, without judgment.
- **Equality** – challenging systemic barriers and supporting accessible care.

These values shape the therapeutic environment and guide how I show up in relationships with clients.

#### 3. Integration of counselling with Core Values

As a counsellor, I honour the values of compassion, grace, integrity, humility, and service. These values align with ethical standards and are expressed through:

- Non-judgmental care for all clients, regardless of faith or background.

- Upholding client choice in whether and how spirituality is included in sessions.
- Providing a safe space where honesty, healing, and growth are possible.
- Practising with professionalism while maintaining clear boundaries.

#### 4. Professional Boundaries

I maintain appropriate boundaries with all clients by:

- Not engaging in dual relationships (e.g. friendships, financial dealings, or relationships outside of counselling).
- Respecting confidentiality and privacy.
- Keeping clear limits around time, contact, and personal disclosure.
- Avoiding exploitation, dependency, or power imbalances.
- Maintaining digital boundaries (e.g., no social media contact, no communication outside agreed channels).

As a counsellor, I do not view myself as being in a position of superiority. My role is to walk alongside clients, supporting their self-awareness through evidence-informed strategies and therapeutic techniques.

#### 5. Ethical Dilemmas and Supervision

If I face an ethical dilemma, I:

- Consult with my clinical supervisor.
- Refer to The ACA Code of Ethics and Practice.
- Prioritise client safety, legal responsibility, and professional integrity
- Inform and involve the client where appropriate.

#### 6. Complaints and Accountability

Clients have the right to raise concerns about any ethical or professional issues. I will respond openly and respectfully. If needed, clients may contact my professional body to make a formal complaint, though I encourage concerns to be discussed directly first so we can explore a resolution together.

#### 7. Review of Statement

This Ethical Framework Alignment Statement is reviewed annually, or in response to changes in membership, law, or practice guidance.

### Policy 17: NDIS-Funded Supports & Documentation Review

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines how NDIS-funded therapeutic supports are delivered, billed, and documented at Flourish Counselling & Psychosocial Support. It reflects my commitment to transparency, ethical care, and client-led collaboration, while aligning with the **NDIS Pricing Arrangements and Price Limits (PAPL)** and the NDIA's definitions of reasonable and necessary supports.

##### 1. My Commitment to Transparent Practice

As a trauma-informed and neuro-affirming counsellor, early childhood intervention professional, and psychosocial recovery coach, I believe NDIS participants deserve clarity, respect, and agency in how their supports are delivered. All services are provided in accordance with NDIS pricing and documentation standards and are designed to support your goals, independence, capacity building, and well-being.

## 2. What NDIS-Funded Supports May Include

Therapeutic supports funded under the NDIS may include:

- Face-to-face counselling or psychosocial recovery coaching sessions (in person or via telehealth).
- **Non-face-to-face supports that are necessary to deliver the support**, including:
  - Documentation review
  - Clinical formulation
  - Session planning
  - Report writing
  - Risk assessment and safety planning
  - Advocacy or referrals
  - Communication with participants, nominees, support coordinators, LACs, or allied health professionals
- Travel to and from sessions (where relevant), billed in line with NDIS travel rules.
- Preparation of progress reports, goal-tracking documents, or evidence for plan reviews.
- Distribution and scoring of psychometric assessments at the beginning and end of a reporting period.
- Participation in case conferences or collaborative planning meetings.

All supports must be **clinically necessary**, directly related to your NDIS goals, and billed under the appropriate Capacity Building support item.

## 3. How Supports Are Planned and Billed

- Supports are tailored to your goals and outlined in your NDIS Plan.
- **Non-face-to-face activities are billable when they are necessary to deliver the support and contribute to your therapeutic outcomes**, as permitted under the NDIS Pricing Arrangements.
- Non-face-to-face time is billed at the **same hourly rate** as face-to-face time.
- Travel time and non-labour travel costs are billed as separate line items in accordance with NDIS travel rules.
- Invoices include clear descriptions of all services provided.
- You may request a breakdown of billed activities at any time.
- All pricing adheres to the current NDIS Price Limits and is updated when NDIS pricing changes.

## 4. Collaborative Practice with NDIS Professionals

When collaborating with support coordinators, LACs, plan managers, or allied health professionals, I aim to foster integrated care while protecting your privacy:

- I only share information with your informed consent (see Consent to Share policy).
- Shared documents reflect your voice, values, and goals.
- Communication is clear, accessible, and free from unnecessary jargon.
- I will always check in with you before responding to external requests.

## 5. Cancellations and No-Shows

- NDIS-funded sessions follow the cancellation policy outlined in the Cancellation Policy.

- If you cancel with less than 48 hours' notice, the full session fee will be charged.
- No-shows will also be charged in accordance with NDIS guidelines.
- Compassionate circumstances will always be considered. Please get in touch with me as soon as possible if something unexpected arises.

## 6. Reasonable and Necessary Supports

All therapeutic supports delivered under the NDIS must meet the criteria of being “reasonable and necessary,” including:

- Direct relevance to your disability and support goals.
- Contribution to your independence, well-being, or community participation.
- Cost-effectiveness and alignment with NDIS budget principles.
- Delivery by a qualified professional in accordance with NDIS standards.

Supports that do not meet these criteria will not be billed to your plan.

## 7. Record Keeping and Security

- All NDIS-related documents are stored securely.
- Digital files are encrypted and password-protected.
- Information is only shared via secure platforms or encrypted email, unless otherwise agreed.
- Travel logs and non-face-to-face activities are documented clearly and accurately.

## 8. Client Rights and Review

- You have the right to ask questions, request clarification, and decline any support offered.
- This policy is reviewed annually or sooner if NDIS guidelines change.
- By engaging in NDIS-funded services, you confirm your understanding and agreement with this policy.

For more information on NDIS-funded therapeutic supports, visit:

- The official [NDIS Funded Supports Overview](#) webpage.

For more information on NDIS Pricing Arrangements and Price Limits, visit:

- The official [NDIS Pricing Arrangements and Price Limits \(PAPL\)](#) webpage.

## Policy 18: Faith and Counselling Policy

### Flourish Counselling & Psychosocial Support

#### Purpose

This policy explains how Christian faith and/or spirituality may be integrated into the counselling process at **Flourish Counselling & Psychosocial Support**. It outlines my values as a counsellor and affirms each client's right to shape how – or whether – spirituality is explored in counselling.

#### 1. My Ethos

As a counsellor, my counselling practice is rooted in values such as compassion, respect, humility, hope, and integrity. These values influence how I relate to clients, create a safe and caring environment, and honour the uniqueness of every individual.

However, my faith and personal beliefs in regard to spirituality are not imposed or defined by one set of beliefs. Counselling is always led by the client's needs, beliefs, and preferences.

## 2. Inclusion of Faith in Counselling

At **Flourish Counselling & Psychosocial Support**, you are welcome to explore spiritual or religious themes if you choose to do so. This might include:

- Talking about your relationship with God or a higher power.
- Exploring spiritual struggles or questions.
- Understanding the meaning of life.
- Discussing past experiences of faith, church, or religious trauma.
- Using prayer, scripture, imagery, or meditation.
- Integrating your beliefs into decisions, values, or emotional healing.

Some clients prefer a more explicitly Christian approach; others do not wish to bring faith into sessions at all. Both are welcome.

## 3. Working with Clients of All Backgrounds

I work respectfully and professionally with:

- Christians from all denominations and traditions.
- People of other faiths or belief systems.
- Clients who are spiritual but not religious.
- Those who have no belief or have an identity as an atheist or agnostic.
- Individuals who have been hurt or confused by religion or faith communities.

I aim to provide a non-judgmental, inclusive space where all clients feel safe, accepted, and heard, regardless of their beliefs.

## 4. Spiritual Abuse and Religious Trauma

If you have experienced harmful spiritual practices, such as:

- Coercive religious control.
- Shame-based teaching.
- Exclusion, rejection, or condemnation.
- Misuse of power in faith settings.
- Fear-based messages about God.

These themes can be safely explored in counselling. I will walk alongside you with sensitivity and without judgment.

## 5. Boundaries Around Faith in Counselling

- I will never preach, proselytise, or impose my beliefs (or lack of) on you.
- I will not assume your beliefs or push a particular viewpoint.
- You are always free to decline spiritual discussions or change your mind.

## 6. When Faith Is Part of the Healing Process

If we agree to integrate spiritual or religious elements into counselling, we may use:

- Prayer at the start or end of a session (initiated by you or mutually agreed).
- Reflection on biblical stories or metaphors, if requested.
- Exploration of how your faith supports or challenges your mental and emotional well-being.
- Consideration of forgiveness, grace, calling, or spiritual growth as therapeutic themes.

This is done only if you request it as a part of your therapy and belief system.

## 7. Supervision and Accountability

Any use of spirituality or religious themes in counselling is regularly reviewed with my clinical supervisor to ensure ethical practice and client-led care. Supervision provides accountability and helps ensure spiritual content is used in a healthy, respectful way.

## 8. Review of Policy

This policy is reviewed annually, or in response to feedback, spiritual concerns raised by clients, or changes in practice.

### Policy 19: Client Safety & Access Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines how I ensure a safe, respectful, and accessible environment for all clients attending face-to-face sessions at **Flourish Counselling & Psychosocial Support**. It includes physical safety, access to information, and emergency arrangements.

### 1. Location of the Counselling Practice

Face-to-face sessions take place in a **dedicated counselling office**. This space is:

- Private and confidential.
- Used exclusively for counselling work.
- Maintained to be clean, welcoming, and comfortable.

Access to the counselling practice is via the side entrance, and clients are advised to take care when entering and exiting the building.

### 2. Physical Safety and Hazards

- My counselling office and the entrance at the building are checked regularly for trip hazards, poor lighting, or other safety concerns.
- Any stairs will be well-lit.
- During wet or icy weather, mats are used to reduce slips.
- Clients are encouraged to wear safe footwear and use handrails when climbing the stairs.
- Any known health and mobility issues will be discussed in advance to ensure safe access.

### 3. Emergency Procedures

- In case of a **fire or medical emergency**, the client will be directed to exit through the main entrance or a designated alternative route.

- A **first aid kit** is available on-site.
- Clients are asked to provide an **emergency contact** during the intake process. This will only be used if there is a serious risk or health emergency (physical or mental health).

#### 4. Lone Working Protocol

As I work alone from time to time, I follow a lone working policy for my safety, including:

- Risk-assessing new clients before offering face-to-face work.
- Having someone aware of my schedule and first-time clients.
- Keep a charged phone nearby during sessions for emergency use.
- Having an SOS alert device nearby to alert authorities of any danger.
- Being free to end a session immediately if I feel unsafe.

These measures are discreet and do not interfere with your counselling experience.

#### 5. Accessibility Considerations

Due to the location and building access, my counselling office may not be **suitable for all clients with significant mobility impairments**. In such cases:

- Online sessions may be offered as an accessible alternative
- If needed, I can facilitate sessions in the ground-floor boardroom.
- I offer “walk and talk” counselling sessions, which may be more appropriate.

#### 6. Emotional Safety

In addition to physical safety, emotional safety is prioritised by:

- Respecting your pace and boundaries in counselling.
- Offering a calm, non-judgmental space.
- Ensuring consistency in scheduling, communication, and professionalism.
- Making sure that the counselling practice is not shared or accessed by others during your session.

#### 7. Visitors and Confidentiality

- I do not allow visitors or family members to be present during sessions unless specifically agreed in advance (e.g. for couples or family work or working with children and parents who wish to be present).
- Sessions are never overheard or interrupted and are respected by other businesses who share the building.

#### 8. Review of Policy

This policy is reviewed annually or whenever changes are made to the therapy space or access arrangements.

#### Policy 20: Lone Working Policy

##### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines the measures taken to ensure personal safety when working alone from home as a self-employed counsellor. It applies to both in-person and remote work and is designed to minimise risk, especially when working with new or high-risk clients.

### 1. Definition of Lone Working

Lone working means working in a situation where no other adults are present who can provide immediate assistance if needed. At **Flourish Counselling & Psychosocial Support**, this includes:

- Seeing clients face-to-face in my private office.
- Holding telehealth sessions while alone on the premises.
- Conducting administrative tasks or supervision work from home without others present.

### 2. Risk Assessment for New Clients

Before offering in-person counselling, especially to new clients, I carry out a basic risk assessment, including:

- Initial contact screening (email or phone).
- Awareness of any prior history of aggression, instability, or serious risk to the safety of others.
- Checking any safeguarding or mental health flags (e.g. violence, self-harm, suicidal ideation).

If a client presents significant risk, I may suggest:

- Online sessions instead of in-person.
- A referral to a more suitable agency or service with additional support capacity.
- Clear safety boundaries for ongoing work.

### 3. Practical Safety Measures

During face-to-face work, I take the following steps:

- Keep a **charged phone** with me during sessions.
- Ensure someone close to me is aware of my working hours and when new clients are expected.
- Have an **emergency exit plan** and keep exits clear.
- Keep doors unlocked (internally) to ensure easy exit if needed.
- Use a **diary or calendar** to log session times and appointments.
- Having an **SOS alert alarm** close by to notify authorities of any distress I may be exposed to.

For telehealth work, although physical risk is minimal, I ensure:

- My working space is secure and private.
- I remain emotionally grounded and supported through supervision.
- I have access to emergency services if a remote client is in crisis.

### 4. Ending Sessions for Safety Reasons

If I feel unsafe during a session, due to client behaviour, threats, or acts of aggression or violence, I reserve the right to:

- End the session immediately.
- Use the SOS alert to notify authorities.
- Ask the client to leave.
- Contact a designated emergency contact or the police if necessary.

- Discontinue the therapeutic relationship and refer on (where appropriate).

All such cases are documented and discussed in supervision.

## 5. Lone Working and Supervision

I regularly bring lone working concerns to clinical supervision. This includes:

- Reviewing safety plans and procedures.
- Reflecting on experiences where I have felt vulnerable.
- Seeking advice if a client presents an increasing risk.

## 6. Lone Working and Confidentiality

Any safety-related check-ins with a trusted person (e.g. telling them I have a session booked) are done **without sharing client identity or sensitive information**, in line with client confidentiality and ethical boundaries.

## 7. Emergencies and Incident Response

In case of a serious incident (e.g. client aggression, collapse, or mental health emergency), I will:

- Call **000**.
- Use client-provided emergency contact details if appropriate.
- Complete a **confidential incident report** afterwards and review safety plans.

## 8. Review of Policy

This policy is reviewed annually or after any incident where safety is impacted.

### Policy 21: Social Media & Communication Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy explains how communication outside of sessions is handled and outlines clear boundaries around social media, text, phone, and email contact. It aims to protect the counselling relationship, client confidentiality, and professional boundaries.

##### 1. Professional Communication Outside of Sessions

At **Flourish Counselling & Psychosocial Support**, communication between sessions is limited to practical and administrative matters such as:

- Booking, cancelling, or rescheduling sessions.
- Discussing sessions with parents when working with minors.
- Clarifying times or payments.
- Brief updates (e.g. "I'm running 5 minutes late").
- Sharing agreed-upon documents or resources.

Therapeutic content is **not** explored or processed via email, phone, or messaging. This protects your privacy and ensures that meaningful work is done within the proper boundaries of the counselling session.

##### 2. Preferred Communication Methods

You may contact me in the following ways:

- **Email:** [flourishcounselling@outlook.com.au](mailto:flourishcounselling@outlook.com.au) - (for general communication, rescheduling, brief updates or appointment-related messages).
- **Phone call or text:** 0410 236 616 - (for general communication, rescheduling, brief updates or appointment-related messages).

I aim to respond within **24 hours**, excluding weekends and public holidays. I do offer crisis or emergency response sessions via phone, text or videoconferencing, and they are charged at normal session rates.

**If you are feeling suicidal or are in immediate crisis, please call:**

- Police, Fire & Ambulance: Triple (000).
- Lifeline: 13 11 14 - [www.lifeline.org.au](http://www.lifeline.org.au).
- Beyond Blue: 1300 22 4636 - [www.beyondblue.org.au](http://www.beyondblue.org.au).
- Suicide Call Back Service: 1300 659 467 - [www.suicidcallbackservice.org.au](http://www.suicidcallbackservice.org.au).
- MensLine: 1300 789 978 - [www.mensline.org.au](http://www.mensline.org.au).
- Kids Helpline: 1800 551 800 - [www.kidshelpline.com.au](http://www.kidshelpline.com.au).
- 13 Yarn: 13 92 76 - [www.13yarn.org.au](http://www.13yarn.org.au).

**3. Social Media Boundaries**

To maintain ethical and therapeutic boundaries:

- I do not accept **friend or connection requests** from clients on personal social media accounts (e.g. Facebook, Instagram, LinkedIn, etc).
- I do not follow clients on social media or view their content unless this is discussed and agreed as therapeutically relevant (e.g. for clients working with digital safety).
- I do not engage in counselling-related discussions on social media platforms.

If I maintain a **professional social media page** (e.g. Facebook business page or Instagram account), it is only used for general information, updates, or psychoeducational posts for the general public. Clients are not required or expected to interact with it and are asked to refrain from doing so if they happen to see it.

**4. Accidental Contact on Social Media**

If we encounter each other on social media (e.g. a suggestion to connect or seeing a post), I will take no action unless you initiate contact. If we run into each other in an online group, I will not acknowledge our professional relationship to protect your confidentiality.

If any online interaction feels uncomfortable or confusing, you are encouraged to raise this with me so we can discuss and clarify.

**5. Counsellor-Initiated Contact**

I will not contact you for non-counselling-related reasons, and I will never comment on your personal social media activity. I do not send marketing emails or newsletters to clients unless you have explicitly opted in through engagement with us.

**6. Confidentiality and Digital Security**

- Emails and messages are kept brief and factual.
- Email correspondence is stored in a secure, password-protected account.
- Messages are deleted regularly and never stored beyond necessity.
- Any digital records of appointments or correspondence are stored securely in line with my cybersecurity policy.

**7. Review of Policy**

This policy is reviewed annually or in response to new technology or communication platforms that may impact boundaries.

## **Policy 22: Ending the Counselling Relationship Policy**

### **Flourish Counselling & Psychosocial Support**

#### **Purpose**

This policy outlines how counselling may come to an end and how endings are managed at **Flourish Counselling & Psychosocial Support**. It ensures that the conclusion of counselling is handled with care, clarity, and respect, whether planned or unplanned.

#### **1. Endings as Part of the Counselling Process**

The ending of counselling is a significant and valuable stage of the counselling journey. A well-managed ending allows space for reflection, closure, and acknowledgement of progress. I aim to make this process collaborative and sensitive to your needs and preferences.

#### **2. Types of Endings**

##### **Planned Ending:**

- Counselling concludes at a mutually agreed point (e.g. goals achieved, time-limited work is completed).
- We review your progress, explore any remaining issues, and reflect on your therapeutic journey.

##### **Client-Initiated Ending:**

- You have the right to end counselling or psychosocial recovery coaching at any time.
- If possible, I encourage at least one final session to process the ending and support a healthy transition.
- If you discontinue sessions without explanation, I may reach out by email or text to check in and make sure you are okay.

##### **Practitioner-Initiated Ending:**

I may suggest or initiate ending counselling if:

- I believe the work has reached a natural conclusion.
- I am no longer the best person to support you (e.g. a specialist referral is more appropriate).
- You are frequently cancelling, missing sessions, or not engaging.
- I have identified a conflict of interest.
- Services are identified as no longer being therapeutically appropriate.
- My availability or circumstances change (e.g. illness, relocation, etc).

In these cases, I will always aim to provide adequate notice, explore your reactions, and signpost you to alternative support if needed.

#### **3. Sudden or Emergency Endings**

Occasionally, counselling may need to end unexpectedly (e.g. personal crisis, change in life circumstances, health emergency). If this happens:

- I will communicate as clearly and kindly as possible.
- Where appropriate, I will refer you to other sources of support.

- I will offer a follow-up conversation if it becomes possible to resume or review later.

#### 4. Breaks in Counselling

Clients may wish to take a temporary break from sessions. This is usually agreed in advance and includes:

- A check-in date or plan to resume.
- An understanding of what may happen if the break becomes long-term.
- A review of support options during the break, if needed.

#### 5. Records and Confidentiality After Ending

- After counselling ends, I will store your records securely for 7 years (or until you reach age 25, if under 18).
- These are kept confidential and are not accessed unless legally required or you request them.
- You may contact me after counselling to request information or re-engage with sessions, depending on availability.

#### 6. Emotional Aspects of Ending

Endings may stir up strong feelings, such as sadness, relief, fear, or pride. These reactions are welcome and a normal part of the counselling relationship as our alliance has grown. This can be discussed in the final session if you wish. I aim to create space for you to reflect on:

- What has changed or been gained.
- What remains unfinished or ongoing.
- Your developing growth and resilience.
- How to move forward with strength and support.

#### 7. Review of Policy

This policy is reviewed annually or after significant changes in my practice model or client feedback on endings.

#### Policy 23: Diversity, Inclusion & Anti-Discrimination Policy

##### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines the commitment of **Flourish Counselling & Psychosocial Support** to promoting inclusion, acceptance and equality in all areas of the counselling practice. It ensures that clients from all backgrounds are treated with dignity, respect, and fairness, and that discrimination is not tolerated under any circumstances.

##### 1. Statement of Inclusion

At **Flourish Counselling & Psychosocial Support**, I provide welcoming and affirming environments for all clients. I value difference and believe that every individual should feel safe, heard, and respected in the counselling space and all areas of life. I do not discriminate based on:

- Race, ethnicity, or cultural background.
- Gender, sex, or gender identity.
- Sexual orientation.
- Religion or belief (including no beliefs).

- Age.
- Marital or partnership status.
- Physical or mental disability.
- Neurodiversity (e.g. autism, ADHD, cognitive impairments, etc).
- Socioeconomic background.
- Immigration or refugee status.
- Any other protected characteristic under Australian laws.

## 2. My Commitment to Inclusive Practice

As a sole practitioner, I take active steps to provide inclusive counselling by:

- Educating myself on systemic inequalities and unconscious biases.
- Reflecting on my own assumptions and privileges in supervision.
- Using language and materials that are respectful and appropriate.
- Being open to feedback if I unintentionally cause harm or discomfort.
- Welcoming clients to bring their whole identity into the room, including aspects that may have been marginalised or misunderstood elsewhere.

## 3. Culturally Sensitive and Trauma-Informed Care

I aim to work in a way that honours each client's lived experience, including the impact of:

- Indigenous or Torres Strait Islander status.
- Racism, homophobia, ableism, transphobia, or classism.
- Cultural shame, identity loss, or historical trauma.
- Religious or spiritual marginalisation.
- Intersectional challenges (e.g. being both neurodivergent and from a minority background).

I do not claim to be an expert in every culture or identity, however, I do have a special interest and passion in advocacy of marginalised communities that have faced poverty, disadvantage or other injustices. I also offer a non-judgmental, curious, and respectful approach, and I welcome your input in shaping the services that I offer in a way that works for you and the communities to which you belong.

## 4. LGBTQI+ Inclusion

I affirm and support LGBTQI+ clients. I welcome discussions around sexual orientation, gender identity, and relationships. I aim to offer a safe space free from religious or cultural judgments, opinions or biases. Counselling will never attempt to suppress, change, or 'fix' your identity. You are accepted as you are.

## 5. Accessibility and Reasonable Adjustments

If you have accessibility needs, whether physical, sensory, or cognitive, I will do my best to accommodate them. This may include:

- Offering telehealth sessions.
- Adjusting pace or structure for neurodivergent clients.
- Providing written summaries or visual materials if required.

- Using plain language or clear instructions.

You are encouraged to let me know what would help you feel most at ease in counselling so I can facilitate your needs for growth and healing.

## 6. Addressing Discrimination or Misunderstanding

If you ever feel that I have acted insensitively, or if something in counselling feels discriminatory, I invite you to bring it into the session. In doing so, I commit to:

- Listening without defensiveness.
- Apologising and repairing harm or any ruptures to the counselling alliance where needed.
- Bringing your concerns to supervision and reflecting so I can make changes where appropriate.

## 7. Ongoing Professional Development

I engage in ongoing training around diversity, inclusion, and anti-oppressive practice, including:

- Neurodiversity awareness.
- LGBTQI+ affirmative therapy.
- Cultural humility.
- Working with complex trauma related to marginalisation, identity-based harm or domestic and family violence.

## 8. Review of Policy

This policy is reviewed annually or following updates to equality legislation, professional guidance, or feedback from clients.

### Policy 24: Risk Assessment Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines how risk is assessed and managed within counselling sessions at **Flourish Counselling & Psychosocial Support**. It ensures that client wellbeing and safety are prioritised, and that appropriate steps are taken when there is a concern about harm to self or others.

### 1. Understanding Risk in Counselling and Psychosocial Recovery Coaching

Risk refers to any situation where there is a concern that a client:

- May be at risk of suicide or self-harm.
- May be at risk of harming others.
- Is experiencing or witnessing physical, emotional, psychological or sexual abuse.
- Is experiencing or inflicting neglect.
- Is vulnerable due to mental health deterioration, substance misuse, or crisis.
- Is exposed to coercion or exploitation.
- Presents as a risk to the practitioner (e.g. through threats or other unsafe behaviours).

As a practitioner, I have both an ethical duty of care and a legal responsibility to respond appropriately to such risks.

## 2. When Risk Is Assessed

Risk is assessed:

- During the initial consultation or assessment session.
- Ongoing, as counselling progresses and new information or behaviours emerge.
- Whenever a disclosure suggests an immediate or emerging risk.
- When a client begins to disengage, cancels frequently, or presents sudden changes in behaviour that raise concerns for personal safety.

## 3. Risk Assessment Process

Risk is evaluated through:

- Direct conversation with the client about thoughts, feelings, and behaviours.
- Use of clinical judgement, training, and supervision.
- Optional use of structured risk assessment tools or checklists.
- Consideration of protective factors (e.g. support networks, faith, coping skills).

Where necessary, I may ask questions such as:

- Are you thinking about hurting yourself or planning to end your life.
- Do you have a plan, means, or timeline.
- Have you felt this way before.
- What stops you from acting on these thoughts.

These questions are asked gently, respectfully, and never as a form of pressure, but to help in safety planning.

## 4. Responding to Risk

If I believe there is an immediate or serious risk:

- I will work collaboratively with you, where possible, to create a safety plan.
- I may contact your GP, mental health crisis team, or emergency services, depending on the urgency.
- I will only share information necessary to protect life or safety.
- I will always aim to inform you before acting, unless doing so increases the risk to your or another's safety.

If you become unresponsive in a session, I will:

- Attempt to reconnect with you.
- Call your nominated emergency contact
- Call emergency services (000).

## 5. Safeguarding Risk to Others

If you disclose a risk to another person (e.g. a child, a vulnerable adult, an elder, or someone you intend to harm), I am legally required to act. This may involve:

- Consulting with my supervisor.
- Contacting DHHS or the police.

- Following local safeguarding procedures.

I will only share relevant information and, where possible, will involve you in the process.

## 6. Self-Care and Ongoing Monitoring

I regularly review all risk concerns during clinical supervision. This helps ensure that:

- My responses are proportionate and ethical.
- I have emotional support in managing difficult disclosures.
- Your safety continues to be monitored in a compassionate, non-alarmist way.

## 7. Documentation

Any risk concerns and actions taken are recorded clearly and confidentially in your case notes (electronically or physically in a locked filing cabinet). These records are stored securely in accordance with Australian cybersecurity laws.

## 8. Review of Policy

This policy is reviewed annually or following any incident involving client risk or a change in safeguarding legislation.

### Policy 25: Working with Children & Young People Policy

#### Flourish Counselling & Psychosocial Support

##### Purpose

This policy outlines the approach taken when working with children and young people (under 18) at **Flourish Counselling & Psychosocial Support**. It ensures that all safeguarding, consent, confidentiality, and communication practices meet legal and ethical standards, and that the well-being of young clients is central to the counselling process.

### 1. Age Range and Scope

This policy applies to all clients under 18 years old.

I provide counselling to children and young people only where:

- I am appropriately trained and insured.
- Their developmental stage and presenting issues are within my professional competence and scope of practice.
- Safeguarding protocols and legal requirements are followed.

### 2. Consent and Parental Involvement

- For clients under 16, written parental or guardian consent is required before counselling can begin.
- For clients aged 14–17, I may accept self-referrals if the young person is deemed to have sufficient maturity and understanding (in line with their understanding of informed consent and their cognitive capacity).
- Consent forms will be completed by their parent/guardian.

I also assess each situation individually to determine the level of parental involvement that supports, rather than hinders, the young person's safety and autonomy.

### 3. Confidentiality and Trust

Confidentiality is essential to building trust with young clients. I explain confidentiality to both the young person and their parent/carer (where involved), including:

- What will and won't be shared.
- The limits of confidentiality, especially around safeguarding and risk.

- That I will encourage open dialogue but will not share session details without the young person's consent (unless required for safety, in cases where cognitive capacity is impaired or the child is unable to understand informed consent).

Parents are updated about general progress if agreed, but not about specific session content unless there is a risk of harm, which would then trigger safeguarding procedures.

#### 4. Safeguarding

Children and young people are considered vulnerable by default under safeguarding law. If a young person:

- Discloses abuse, neglect, or exploitation.
- Is at risk of self-harm or suicide.
- Appears to be a risk to or from others.

I have a legal duty to take appropriate action. This may include:

- Informing their parent or carer.
- Contacting DHHS or other safeguarding authorities.
- Consulting with my clinical supervisor.

Safeguarding concerns are always recorded in the client file, and action is taken in accordance with the Family Law Act 1975 and local safeguarding board guidance.

Under the **Family Law Act 1975**, practitioners are required to:

- Prioritise the best interests of the child (Part VII of the Act).
- Disclose information if necessary to:
  - Protect a child from harm.
  - Prevent or lessen a serious and imminent threat to life or health.
  - Comply with Commonwealth, state, or territory laws (e.g. mandatory reporting).

Sections 10D and 10H specifically address confidentiality in family counselling and dispute resolution, allowing disclosure when there's a reasonable belief that it's necessary for safety or legal compliance.

#### Communication

I ensure that:

- For under-18s, communication outside sessions (e.g. for appointment reminders) is made with the parent/guardian with consent from the young person.
- I do not engage with clients under 18 via social media or any other platforms, and boundaries are clearly explained from the outset.
- For telehealth sessions, I confirm that the young person has a quiet, private space and that a responsible adult is nearby but not present in the session unless agreed by the young person.

#### 6. Working Ethically with Young People

I ensure that:

- Language is developmentally appropriate and understandable.
- Therapeutic materials and approaches are age-appropriate (e.g. use of art, metaphors, or social storybooks where helpful).
- Sessions are paced with sensitivity to the young person's level of emotional and cognitive development.

- Boundaries around time, contact, and endings are clear and supportive.

### **7. Record Keeping**

- Separate, confidential records are kept for young clients.
- Records are stored securely in accordance with my privacy policy.
- Records for clients under 18 are kept until they reach the age of **25 years**, in line with insurance and safeguarding guidance.

### **8. Review of Policy**

This policy is reviewed annually, or sooner if there are changes in safeguarding law, child protection guidance, or practice experience.

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