PHOENIX
THERAPY & LEARNING
Where creativity and reflection deepen practice.

Safeguarding & Protection Handbook



Author: Karen Durkin

Review Date: July 2027

"Safeguarding is not simply about responding to risk; it is about creating professional relationships in which people feel safe, respected and heard."

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SECTION ONE

Foundations of Safeguarding

Providing the principles, responsibilities and legal framework that underpin all aspects of professional practice.

1. Purpose

This policy should be read alongside Phoenix Therapy & Learning's Confidentiality, GDPR and Professional Boundaries policies where applicable.

Phoenix Therapy & Learning is committed to promoting the safety, welfare and wellbeing of every child, young person and adult who accesses its services. Safeguarding is a fundamental part of ethical and professional practice and underpins all aspects of therapeutic work, clinical supervision, consultation and training.

The purpose of this policy is to provide a clear framework for recognising, responding to and reporting safeguarding concerns, while promoting a culture of safety, respect and accountability. It outlines the responsibilities, procedures and professional standards that guide all work undertaken by Phoenix Therapy & Learning.

This policy applies to all services provided by Phoenix Therapy & Learning, including:

- Clinical Supervision (face-to-face and online)
- Play Therapy
- SandStory Therapy
- Adult Therapy
- Therapeutic work with teenagers
- Consultation and professional support
- Workshops, training and reflective practice

Phoenix Therapy & Learning recognises that safeguarding is everyone's responsibility. Every individual has the right to be protected from abuse, neglect, exploitation and harm, regardless of their age, ability, disability, gender, race, religion, culture, sexual orientation or socio-economic background.

Safeguarding is not limited to responding to concerns or disclosures. It also involves creating therapeutic and supervisory relationships that are psychologically safe, respectful and grounded in clear professional boundaries, enabling children, young people and adults to feel heard, valued and supported

Phoenix Therapy & Learning is committed to working collaboratively with parents, carers, professionals and statutory agencies whenever safeguarding concerns arise and will always act in the best interests of the individual, in accordance with current legislation, professional standards and ethical frameworks.

2. Scope of Practice

This Safeguarding Policy applies to all professional services delivered by Phoenix Therapy & Learning, whether provided face-to-face or online.

The policy has been developed to ensure that safeguarding remains central to all areas of practice and reflects the organisation's commitment to providing safe, ethical and professionally accountable services.

The services covered by this policy include:

- Clinical Supervision for therapists and other helping professionals.
- Play Therapy with children.
- SandStory Therapy with children, teenagers and adults.
- Adult Therapy.
- Therapeutic work with teenagers.
- Professional consultation.
- Workshops, training and reflective practice.

Phoenix Therapy & Learning works with individuals across a range of settings including schools, private practice, community organisations and online platforms. Safeguarding responsibilities remain the same regardless of where or how services are delivered.

Within Clinical Supervision, the supervisor's role is to support supervisees in maintaining safe, ethical and effective practice. Whilst responsibility for taking safeguarding action remains with the supervisee and, where applicable, their employing organisation or commissioning service. The role of the Clinical Supervisor is to support reflective decision-making, promote ethical practice and challenge unsafe practice where necessary.

Within therapeutic practice, safeguarding responsibilities extend to children, young people and adults who may be experiencing abuse, neglect, exploitation, significant emotional distress or other circumstances that place them or others at risk of harm. Appropriate action will always be taken in accordance with current safeguarding legislation, professional ethical frameworks and local safeguarding procedures. Where safeguarding concerns arise, Phoenix Therapy & Learning will work collaboratively with clients, families, schools, professionals and statutory agencies whenever it is safe and appropriate to do so, ensuring that the welfare of the individual remains the primary consideration.

Key Principle

Safeguarding responsibilities apply equally across all services provided by Phoenix Therapy & Learning. Regardless of the client's age, presenting concerns or therapeutic approach, promoting safety and wellbeing remains at the heart of all professional practice.

3. Definitions

Understanding the key terms used throughout this policy.

For the purposes of this policy, the following definitions apply:

Safeguarding

Safeguarding is the process of protecting children, young people and adults from abuse, neglect, exploitation and harm whilst promoting their safety, welfare and wellbeing. It includes preventing harm, responding appropriately to concerns, working collaboratively with others and creating environments in which individuals feel safe, respected and supported.

Child

A child is any person under the age of 18 years, as defined by the Children Act 1989.

Young Person / Teenager

For the purposes of this policy, the terms *young person* and *teenager* refer to individuals under the age of 18 who are accessing therapeutic services appropriate to their age, developmental stage and individual needs.

Adult at Risk

An adult at risk is a person aged 18 years or over who has needs for care and support and who may be unable to protect themselves from abuse, neglect or exploitation because of those needs, as defined by the Care Act 2014.

Clinical Supervision

Clinical Supervision is a confidential, collaborative and reflective professional relationship that supports therapists and other helping professionals in delivering safe, ethical and effective practice. It promotes reflective thinking, professional development, safeguarding awareness and ethical decision-making, whilst maintaining the welfare of clients as the primary consideration.

Professional Curiosity

Professional curiosity is the willingness to remain open-minded, ask appropriate questions, explore concerns thoughtfully and seek a fuller understanding of an individual's circumstances rather than making assumptions. It supports informed safeguarding decisions and promotes the early recognition of potential risk.

Professional Judgement

Professional judgement is the process of making informed decisions based upon legislation, ethical frameworks, professional knowledge, clinical experience, evidence and reflective practice. It involves balancing available information, assessing risk and acting in the best interests of the individual.

Confidentiality

Confidentiality is the professional responsibility to protect information shared within therapy, Clinical Supervision and consultation. It is fundamental to building trust and maintaining safe therapeutic relationships. However, confidentiality is not absolute and may be overridden where there is a legal or ethical duty to share information in order to protect an individual or others from significant harm.

Disclosure

A disclosure is the communication of information that indicates an individual may be experiencing, or has experienced, abuse, neglect, exploitation or another safeguarding concern. Disclosures may be made verbally, in writing, through behaviour or through creative and symbolic expression. Any disclosure will be responded to sensitively and assessed within the wider safeguarding context.

Creative and Symbolic Expression

Creative and symbolic expression refers to the use of play, SandStory Therapy, artwork, metaphor, imagery, storytelling or other creative processes to explore thoughts, feelings and experiences. Whilst these approaches may provide valuable therapeutic insight and raise professional curiosity, they are not regarded as evidence of abuse or neglect in isolation. Safeguarding decisions are always based upon the wider clinical picture, professional judgement and all relevant information available.

Multi-Agency Working

Multi-agency working is the collaborative process of sharing appropriate information and working alongside other professionals and organisations to promote the safety, welfare and wellbeing of children, young people and adults.

Duty of Care

Duty of care refers to the legal and ethical responsibility to act in a way that promotes the safety, welfare and wellbeing of those accessing Phoenix Therapy & Learning services. This includes recognising safeguarding concerns, taking appropriate action where necessary and maintaining professional standards at all times.

Definitions within this policy should be read alongside current UK safeguarding legislation, statutory guidance and the ethical frameworks of relevant professional bodies. Where legislation or professional guidance is updated, the most current version will apply.

4. Safeguarding Principles

The values that underpin safe, ethical and professional practice.

Phoenix Therapy & Learning believes that safeguarding is more than responding to concerns or making referrals. It is about creating environments where children, young people and adults feel physically, emotionally and psychologically safe to explore, express themselves and seek support.

The following principles underpin all aspects of professional practice:

• The welfare of the individual is paramount

The safety, welfare and wellbeing of every child, young person and adult will always be the primary consideration when making professional decisions.

• Safeguarding is everyone's responsibility

Protecting individuals from harm requires shared responsibility. Phoenix Therapy & Learning works collaboratively with clients, families, carers, schools, organisations and statutory agencies to promote safety and wellbeing.

• Early identification and timely action

Safeguarding concerns will be recognised, responded to and recorded promptly. Early intervention can prevent concerns from escalating and promote better outcomes.

• Professional curiosity

Safeguarding often requires practitioners to remain curious rather than making assumptions. Changes in behaviour, presentation, relationships or emotional wellbeing will be explored sensitively, recognising that they may indicate unmet needs or potential harm.

• Respect, dignity and inclusion

Every individual has the right to be treated with dignity, compassion and respect regardless of their age, ability, disability, race, ethnicity, religion, culture, gender identity, sexual orientation or socio-economic background.

• Safe therapeutic relationships

Phoenix Therapy & Learning is committed to creating therapeutic and supervisory relationships that are built upon trust, consistency, clear boundaries, empathy and respect. Emotional safety provides the foundation for reflection, healing and personal growth.

- **Professional accountability**

All services are delivered within current legislation, professional ethical frameworks and recognised safeguarding guidance. Clinical supervision, continuing professional development and reflective practice form an essential part of maintaining safe and effective professional standards.

- **Confidentiality with clear safeguarding boundaries**

Confidentiality is fundamental to building trust; however, it is not absolute. Information may be shared without consent where there is a legal or ethical duty to protect an individual or others from significant harm. Wherever possible, information sharing will be discussed openly with the individual concerned unless doing so would increase the risk of harm.

Key Principle

Safeguarding is not simply about responding to harm—it is about creating safe, respectful and trusting relationships in which children, young people and adults are able to flourish.

5. Legal and Professional Framework

The legislation, guidance and professional standards that inform safe practice.

Phoenix Therapy & Learning is committed to delivering safe, ethical and legally compliant services. All therapeutic work, clinical supervision, consultation and training are undertaken in accordance with current UK legislation, statutory guidance and recognised professional standards.

Professional practice is informed by the following legislation and guidance (or the most current versions available at the time of review):

Safeguarding Children

- Children Act 1989
- Children Act 2004
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (current statutory guidance)
- Education Act 2002

Safeguarding Adults

- Care Act 2014
- Mental Capacity Act 2005
- Mental Capacity (Amendment) Act 2019 (where applicable)

Protection from Abuse and Exploitation

- Domestic Abuse Act 2021
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Modern Slavery Act 2015

Information Sharing and Data Protection

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Freedom of Information Act 2000 (where applicable)

Professional Standards

Phoenix Therapy & Learning is committed to maintaining the highest standards of professional practice through:

- Working within the **BACP Ethical Framework for the Counselling Professions and the PTUK Ethical Framework and professional standards**, alongside other relevant professional guidance applicable to the services provided.
- Maintaining enhanced DBS clearance where required.
- Receiving regular Clinical Supervision.
- Undertaking Continuing Professional Development (CPD).
- Maintaining appropriate Professional Indemnity and Public Liability Insurance.
- Working within recognised safeguarding procedures and local multi-agency guidance where appropriate.

Phoenix Therapy & Learning recognises that legislation, safeguarding guidance and professional standards continue to evolve. This policy will therefore be reviewed annually, or sooner where significant legislative or professional changes occur, to ensure that practice remains current and reflects best practice.

Key Principle

Safe and ethical practice is strengthened by maintaining current professional knowledge, working within recognised legal frameworks and committing to continuous learning and reflective practice.

6. Roles and Responsibilities

Maintaining safe, ethical and accountable professional practice.

Phoenix Therapy & Learning recognises that safeguarding is an integral part of every professional role. Safeguarding responsibilities extend across all areas of practice, including therapeutic work, clinical supervision, consultation and training.

As an independent practitioner, Karen Durkin is responsible for maintaining safe, ethical and legally compliant practice by:

Professional Practice

- Placing the welfare and wellbeing of children, young people and adults at the centre of all professional decision-making.
- Maintaining clear professional boundaries at all times.
- Working within recognised ethical frameworks, professional standards and current safeguarding legislation.
- Ensuring safeguarding concerns are recognised, responded to and recorded appropriately.
- Working collaboratively with parents, carers, organisations and statutory agencies where safeguarding concerns arise.

Safe Recruitment and Professional Standards

Phoenix Therapy & Learning is committed to maintaining high professional standards through:

- Holding an Enhanced Disclosure and Barring Service (DBS) certificate where required.
- Maintaining appropriate Professional Indemnity and Public Liability Insurance.
- Receiving regular Clinical Supervision.
- Undertaking Continuing Professional Development (CPD), including regular safeguarding training.
- Maintaining membership of relevant professional organisations where applicable.
- Working within current ethical frameworks and professional codes of conduct.

Clinical Supervision

Within Clinical Supervision, Phoenix Therapy & Learning provides a reflective and professionally challenging space that promotes safe, ethical and effective practice.

The supervisor's responsibilities include:

- Supporting supervisees to recognise safeguarding concerns.
- Encouraging reflective decision-making when managing risk.
- Challenging unsafe or unethical practice where necessary.
- Supporting supervisees in understanding their legal and professional responsibilities.
- Maintaining appropriate records of safeguarding discussions within supervision.

Whilst safeguarding decisions relating to individual clients remain the responsibility of the supervisee and, where applicable, their employing organisation, Phoenix Therapy & Learning has an ethical responsibility to promote safe practice and take appropriate action where there is a significant concern that a client or supervisee may be at risk of harm.

Therapeutic Practice

Within therapeutic work, Phoenix Therapy & Learning is committed to providing emotionally and psychologically safe environments where clients feel respected, heard and supported.

Therapeutic practice includes:

- Working within the limits of professional competence.
- Recognising when additional support or referral is required.
- Responding appropriately to disclosures or safeguarding concerns.
- Maintaining accurate, factual and confidential records.
- Seeking consultation or supervision whenever safeguarding concerns arise.

Accountability

Phoenix Therapy & Learning accepts personal and professional responsibility for maintaining high standards of safeguarding practice. Concerns relating to safeguarding will always be taken seriously and acted upon in accordance with current legislation, professional guidance and ethical responsibilities.

Key Principle

Every professional decision should promote the safety, dignity and wellbeing of those accessing Phoenix Therapy & Learning services.

SECTION TWO

Safeguarding Across Different Areas of Practice

Recognising that safeguarding responsibilities vary across different client groups while remaining rooted in the same commitment to safety, dignity and professional care.

7. Clinical Supervision

Promoting safe, ethical and reflective practice.

Clinical Supervision is fundamental to the delivery of safe, ethical and effective therapeutic practice. It provides a confidential, reflective and professionally supportive space in which supervisees can explore their clinical work, develop their professional competence and ensure that the welfare of their clients remains central to all aspects of practice.

Phoenix Therapy & Learning recognises that supervisees may work with children, young people and adults across a variety of therapeutic settings. Whilst responsibility for safeguarding decisions remains with the supervisee and, where applicable, their employing organisation, Clinical Supervision provides an essential opportunity to reflect upon safeguarding concerns, assess levels of risk and consider appropriate courses of action.

The purpose of safeguarding within Clinical Supervision is to support supervisees in maintaining safe, ethical and professionally accountable practice. Supervision encourages reflective thinking, professional curiosity and sound clinical judgement when working with clients who may be experiencing abuse, neglect, exploitation, emotional distress or circumstances that place them or others at risk of harm.

Phoenix Therapy & Learning is committed to creating a supervisory relationship in which safeguarding concerns can be explored openly, respectfully and without judgement. Supervision promotes collaborative reflection whilst recognising that difficult decisions may sometimes need to be made in order to protect the welfare and wellbeing of a client or another individual.

Within Clinical Supervision, Phoenix Therapy & Learning will:

- Promote safe, ethical and evidence-informed practice.
- Encourage professional curiosity when safeguarding concerns arise.
- Support supervisees to recognise, assess and respond appropriately to safeguarding risks.
- Explore safeguarding concerns relating to children, young people and adult clients.
- Encourage supervisees to follow the safeguarding policies, procedures and reporting responsibilities of their employing organisation or professional setting.

- Support supervisees in considering appropriate consultation, referrals and information sharing where required.
- Challenge unsafe, unethical or potentially harmful practice where necessary.
- Maintain appropriate supervision records in accordance with confidentiality, data protection legislation and professional standards.
- Maintain regular Continuing Professional Development (CPD), safeguarding training and clinical supervision to ensure knowledge, competence and professional practice remain current.

The Role of Creativity in Clinical Supervision

Phoenix Therapy & Learning recognises that creativity can deepen reflection and enhance professional understanding. Creative methods may be used within Clinical Supervision to support reflection, increase self-awareness and explore complex therapeutic processes. These approaches are used to complement reflective dialogue and are never intended to replace safeguarding procedures, evidence-based decision-making or professional accountability.

Creativity can help supervisees gain new perspectives, recognise patterns within their practice and develop greater awareness of the therapeutic relationship. When used appropriately, creative reflection strengthens professional judgement, ethical decision-making and confidence when responding to safeguarding concerns, whilst ensuring that the welfare of the client remains the primary focus.

Creative methods are always used purposefully, ethically and in accordance with the supervisee's level of experience, the needs of the supervisee, the welfare of the client and recognised professional standards.

Clinical Supervision also provides an opportunity to explore how the therapeutic relationship, transference, countertransference, parallel process and the supervisor's own emotional responses may influence professional judgement. Reflective exploration of these processes can strengthen decision-making, reduce unconscious bias and support safe, ethical practice.

Where there is reason to believe that a supervisee is failing to take appropriate action to safeguard a client, and there is a significant risk of harm, Phoenix Therapy & Learning has an ethical and professional responsibility to take appropriate action in accordance with current legislation, professional guidance and ethical responsibilities. Wherever possible, concerns will be discussed openly with the supervisee before any action is taken, unless doing so would increase the risk of harm or place another person at further risk.

Key Principle

Clinical Supervision is not only a place for reflection; it is also a safeguard for clients, supporting therapists to think clearly, practise ethically and make decisions that promote safety, wellbeing and professional accountability.

8. Adult Therapy

Promoting safety, wellbeing and ethical therapeutic practice.

Phoenix Therapy & Learning is committed to providing a safe, respectful and professionally supportive therapeutic environment, grounded in clear professional boundaries, in which adults feel supported to explore their thoughts, emotions and life experiences. Safeguarding is an integral part of therapeutic practice and is underpinned by the principles of dignity, respect, autonomy and professional responsibility.

Adult clients may present with a wide range of experiences, including trauma, bereavement, relationship difficulties, anxiety, depression or other emotional challenges. During the therapeutic process, individuals may disclose information that indicates they are experiencing abuse, neglect, exploitation or circumstances that place them or others at risk of harm.

Phoenix Therapy & Learning recognises that adults have the right to make informed choices about their lives wherever they have the mental capacity to do so. Therapeutic work therefore seeks to balance respect for an individual's autonomy with the professional responsibility to take appropriate action where there is evidence of significant harm or risk.

Within Adult Therapy, Phoenix Therapy & Learning will:

- Promote a safe, respectful and psychologically informed therapeutic environment.
- Work within recognised ethical frameworks and current safeguarding legislation.
- Recognise and respond appropriately to safeguarding concerns affecting adult clients.
- Support clients in understanding the options available to them whenever safeguarding concerns arise.
- Respect confidentiality whilst clearly explaining the circumstances in which information may need to be shared to protect an individual or others from significant harm.
- Maintain accurate, factual and contemporaneous records.
- Seek consultation or Clinical Supervision whenever safeguarding concerns require additional reflection or professional guidance.
- Work collaboratively with statutory agencies and other professionals where safeguarding concerns require multi-agency involvement.

Phoenix Therapy & Learning recognises that safeguarding concerns affecting adults may include, but are not limited to:

- Domestic abuse.
- Coercive or controlling behaviour.
- Sexual abuse.
- Physical abuse.
- Psychological or emotional abuse.
- Financial or economic abuse.
- Self-neglect.
- Modern slavery.
- Exploitation.
- Suicide risk or significant self-harm.
- Abuse by a person in a position of trust.

Where safeguarding concerns arise, decisions will be guided by the principles of proportionality, partnership, empowerment, prevention, protection and accountability, as outlined within the Care Act 2014.

Mental Capacity

Where there are concerns regarding an adult's ability to make informed decisions, Phoenix Therapy & Learning will work in accordance with the principles of the Mental Capacity Act 2005. Every adult will be presumed to have capacity unless it is established otherwise. Decisions relating to safeguarding will always seek to balance an individual's right to autonomy with the duty to protect them from significant harm.

Key Principle

Adult safeguarding is founded upon respect for autonomy, professional curiosity and timely intervention, ensuring that individuals are supported to make informed choices whilst being protected from abuse, neglect and exploitation.

9. Therapeutic Work with Teenagers

Supporting young people within a safe, ethical and developmentally appropriate therapeutic relationship.

Phoenix Therapy & Learning is committed to providing a safe, respectful and developmentally appropriate therapeutic environment in which young people feel heard, valued and supported. Therapeutic work with teenagers recognises the unique challenges of adolescence, a period often characterised by significant emotional, psychological, social and neurological development.

Young people may seek therapeutic support for a wide range of reasons, including anxiety, depression, trauma, bereavement, family difficulties, emotional regulation, identity, self-esteem, relationship challenges or significant life events. During therapy, safeguarding concerns may emerge through direct disclosure, behaviour, emotional presentation, creative expression or information shared by parents, carers or other professionals.

Phoenix Therapy & Learning recognises that young people have a developing capacity to make informed decisions and express their views. Therapeutic practice therefore seeks to balance respect for the young person's growing independence with the legal and ethical responsibility to safeguard their welfare.

Within Therapeutic Work with Teenagers, Phoenix Therapy & Learning will:

- Provide a safe, confidential and developmentally appropriate therapeutic environment.
- Build trusting therapeutic relationships founded upon respect, empathy and clear professional boundaries.
- Explain confidentiality and its limits in a manner appropriate to the young person's age and understanding.
- Promote the young person's voice whilst recognising safeguarding responsibilities.
- Remain professionally curious when concerns arise regarding the young person's safety or wellbeing.
- Recognise and respond appropriately to safeguarding concerns in accordance with current legislation and safeguarding guidance.
- Maintain accurate, factual and contemporaneous records.
- Work collaboratively with parents, carers and other professionals where appropriate and in the young person's best interests.

- Seek consultation or Clinical Supervision whenever safeguarding concerns require further reflection or professional guidance.

Phoenix Therapy & Learning recognises that safeguarding concerns affecting teenagers may include, but are not limited to:

- Self-harm.
- Suicidal thoughts or behaviours.
- Emotional abuse.
- Physical abuse.
- Sexual abuse.
- Neglect.
- Child Sexual Exploitation (CSE).
- Child Criminal Exploitation (CCE).
- County Lines exploitation.
- Online abuse and exploitation.
- Grooming.
- Harmful sexual behaviour.
- Domestic abuse within the family.
- Coercive and controlling behaviour.
- Bullying, including cyberbullying.
- Substance misuse.

Safeguarding decisions will always be based upon the individual circumstances of the young person, their developmental needs, available information, professional judgement and current safeguarding legislation. Wherever possible, young people will be involved in decisions affecting them, whilst recognising that safeguarding responsibilities may require information to be shared without consent where there is a risk of significant harm.

Phoenix Therapy & Learning is committed to working collaboratively with families and professionals wherever appropriate, recognising that effective safeguarding is strengthened through respectful communication and shared responsibility whilst maintaining the welfare of the young person as the primary consideration.

Key Principle

Therapeutic work with teenagers is built upon trust, respect and collaboration. Safeguarding seeks to balance the young person's developing independence with the professional responsibility to protect their safety, welfare and future wellbeing.

10. SandStory Therapy

Creating a safe, ethical and professionally supported space for symbolic exploration.

SandStory Therapy provides a creative and non-verbal therapeutic approach that enables children, teenagers and adults to explore thoughts, feelings and life experiences through symbolism, metaphor and narrative. By creating scenes within the sand tray using a range of miniature figures and objects, clients are able to express experiences that may be difficult to communicate through words alone.

Phoenix Therapy & Learning recognises that SandStory Therapy can facilitate deep emotional exploration and may bring unconscious thoughts, memories or experiences into awareness. Whilst symbolic expression can provide valuable insight into a client's internal world, it should never be viewed in isolation or interpreted as evidence that abuse, neglect or trauma has occurred.

Therapeutic decisions relating to safeguarding are never based solely upon symbolic representations within the sand tray. Any safeguarding concerns are considered alongside the wider clinical picture, including verbal communication, observed behaviours, known history, professional observations and any other relevant information available.

Phoenix Therapy & Learning is committed to providing a psychologically safe environment in which clients feel respected, accepted and emotionally contained whilst engaging in symbolic therapeutic work.

Within SandStory Therapy, Phoenix Therapy & Learning will:

- Create a physically and emotionally safe therapeutic environment.
- Respect the client's pace and readiness for exploration.
- Maintain clear therapeutic boundaries throughout the therapeutic process.
- Avoid making assumptions or interpretations based solely upon symbolic material.
- Remain professionally curious when themes within the sand tray raise safeguarding concerns.
- Respond appropriately to verbal disclosures or safeguarding concerns that arise during therapy.
- Seek consultation or Clinical Supervision where safeguarding concerns require further reflection.

- Maintain accurate, factual and contemporaneous records that distinguish clearly between observation and interpretation.
- Work collaboratively with other professionals where safeguarding responsibilities require information sharing.

Symbolic Expression and Safeguarding

Phoenix Therapy & Learning recognises that symbols are deeply personal and can hold different meanings for different individuals. The same figure, object or scene may represent entirely different experiences depending upon the client's personal history, developmental stage, culture and life experiences.

For this reason, symbolic material is approached with curiosity rather than certainty. Exploration is led by the client wherever appropriate, and safeguarding decisions are based upon the totality of information available rather than symbolic expression alone.

The purpose of SandStory Therapy is not to investigate abuse or obtain evidence. Its purpose is to provide a safe therapeutic space in which clients can explore their internal world, develop insight and work towards emotional healing. Where safeguarding concerns emerge during this process, they will be managed in accordance with current safeguarding legislation, professional ethical frameworks and this safeguarding policy.

Where clients become emotionally overwhelmed during SandStory Therapy, Phoenix Therapy & Learning will use appropriate therapeutic grounding, pacing and containment strategies to support emotional regulation before continuing or concluding the session. Safeguarding concerns identified during or following a session will be managed in accordance with this policy and current professional guidance.

Key Principle

SandStory Therapy creates opportunities for symbolic expression and emotional exploration. Safeguarding decisions are always informed by professional judgement, evidence, the wider clinical context and the welfare of the client, rather than by symbolic material alone.

11. Multi-Agency Working and Professional Collaboration

Working together to safeguard and promote wellbeing.

Phoenix Therapy & Learning recognises that effective safeguarding relies upon timely communication, respectful collaboration and shared professional responsibility. Safeguarding concerns are often best addressed when professionals work together to promote the safety, welfare and wellbeing of children, young people and adults.

Where appropriate and in accordance with legal and ethical responsibilities, Phoenix Therapy & Learning will work collaboratively with clients, families, carers, employers, Designated Safeguarding Leads (DSLs), healthcare professionals and statutory agencies to ensure safeguarding concerns are managed appropriately.

Information will be shared on a need-to-know basis in accordance with UK GDPR, the Data Protection Act 2018, current safeguarding legislation and the relevant professional ethical framework. Wherever appropriate, consent will be sought before information is shared. However, consent is not required where there is a legal or professional duty to protect an individual or others from significant harm.

Where safeguarding concerns arise during Clinical Supervision, responsibility for safeguarding action remains with the supervisee and, where applicable, their employing organisation. The Clinical Supervisor supports reflective decision-making, promotes ethical practice and provides appropriate professional challenge to ensure safeguarding responsibilities are understood and fulfilled.

Where safeguarding concerns arise within Adult Therapy, Therapeutic Work with Teenagers or SandStory Therapy, Phoenix Therapy & Learning will liaise with relevant professionals and agencies whenever this is lawful, proportionate and necessary to safeguard the individual or others.

Professional records will accurately document significant safeguarding discussions, decisions, actions taken and any information shared with other agencies.

Key Principle

Effective safeguarding is strengthened through respectful collaboration, timely communication and shared professional responsibility, whilst always keeping the welfare of the individual at the centre of decision-making.

SECTION THREE

Responding to Safeguarding Concerns

Taking timely, proportionate and professionally accountable action to protect children, young people and adults from harm.

Responding to safeguarding concerns requires timely action, sound professional judgement and clear professional accountability. This section outlines the steps taken by Phoenix Therapy & Learning from recognising concerns through to responding, sharing information appropriately and maintaining accurate records.

12. Recognising Safeguarding Concerns

Recognising when an individual may be at risk of harm.

Safeguarding concerns may arise in many different ways and are not always communicated through a direct verbal disclosure. Children, young people and adults may communicate distress through changes in behaviour, emotional presentation, relationships, physical appearance, verbal communication or creative expression. Some individuals may not recognise that they are experiencing abuse or neglect, whilst others may feel unable or frightened to talk openly about their experiences.

Recognising safeguarding concerns is an ongoing process rather than a single event. Information may emerge gradually over time, requiring practitioners to remain observant, professionally curious, reflective and responsive as the therapeutic or supervisory relationship develops.

Phoenix Therapy & Learning recognises the importance of remaining professionally curious and avoiding assumptions. A single sign, behaviour or disclosure does not necessarily indicate abuse or neglect; however, patterns of behaviour, significant changes in presentation or information gathered over time may indicate that further exploration or safeguarding action is required.

Safeguarding concerns may include, but are not limited to:

- Physical abuse.
- Emotional or psychological abuse.
- Sexual abuse.
- Neglect.
- Domestic abuse.
- Child Criminal Exploitation (CCE).
- Child Sexual Exploitation (CSE).
- County Lines exploitation.
- Financial abuse.
- Modern slavery.
- Self-neglect.
- Online abuse and exploitation.
- Radicalisation.
- Harmful sexual behaviour.

- Suicide risk or significant self-harm.
- Coercive or controlling behaviour.

When concerns arise, Phoenix Therapy & Learning will consider the wider context rather than relying upon a single observation or event. Professional judgement will be informed by:

- Information shared by the client or supervisee.
- Behavioural observations.
- Emotional presentation.
- Known history and relevant background information.
- Information provided by parents, carers or other professionals where appropriate.
- Clinical reflection and Clinical Supervision.
- Current safeguarding legislation, statutory guidance and professional ethical frameworks.

Creative Expression and Professional Curiosity

Phoenix Therapy & Learning recognises that creativity can provide valuable insight into an individual's internal world. Play, SandStory Therapy, artwork, metaphor, symbolism, storytelling and other forms of creative expression may raise professional curiosity and deepen therapeutic understanding.

However, creative expression should never be viewed as evidence of abuse or neglect in isolation.

Safeguarding decisions will never be based solely upon symbolic material, artwork, play themes or SandStory scenes. These forms of expression are considered alongside verbal communication, behavioural observations, known history, contextual information and any other relevant evidence available.

Where creative expression raises safeguarding concerns, Phoenix Therapy & Learning will respond by exploring the material sensitively, maintaining professional curiosity, seeking consultation or Clinical Supervision where appropriate, and following recognised safeguarding procedures whenever there is reasonable cause for concern.

Phoenix Therapy & Learning recognises that recognising safeguarding concerns requires thoughtful professional judgement rather than assumption or interpretation. The aim is always to understand the individual's experience whilst ensuring that their safety, welfare and wellbeing remain the primary consideration.

Key Principle

Safeguarding begins with noticing. Professional curiosity, careful observation and thoughtful reflection help ensure that concerns are recognised, explored appropriately and responded to in the best interests of the individual.

13. Responding to Disclosures

Responding with sensitivity, professionalism and appropriate safeguarding action.

Phoenix Therapy & Learning recognises that disclosures of abuse, neglect, exploitation or harm may arise during Adult Therapy, SandStory Therapy or Clinical Supervision. Disclosures may be made directly through verbal communication or emerge gradually over time as trust develops within the therapeutic or supervisory relationship.

When an individual chooses to disclose sensitive or distressing information, Phoenix Therapy & Learning is committed to responding with empathy, professionalism and respect. The immediate priority is to ensure that the individual feels heard, supported and safe whilst enabling appropriate safeguarding decisions to be made.

When responding to a disclosure, Phoenix Therapy & Learning will:

- Remain calm, attentive and supportive.
- Listen carefully without expressing shock, disbelief or judgement.
- Allow the individual to speak in their own words and at their own pace.
- Avoid asking leading or investigative questions.
- Clarify information only where necessary to understand immediate risk or determine appropriate safeguarding action.
- Reassure the individual that they have been heard and taken seriously.
- Explain, where appropriate, the limits of confidentiality and the circumstances in which information may need to be shared.
- Make clear that any decision to share information will always be based upon protecting the safety and wellbeing of the individual or others.
- Record the disclosure accurately, distinguishing between the individual's own words, factual observations and professional reflections.
- Take appropriate safeguarding action in accordance with current legislation, professional guidance and organisational procedures where applicable.

Phoenix Therapy & Learning recognises that disclosures do not always relate to current abuse or immediate risk. Some disclosures may relate to historical experiences or traumatic events that no longer present an ongoing safeguarding concern. In these circumstances, careful professional judgement will be exercised to determine whether further safeguarding action is required whilst continuing to provide appropriate therapeutic support.

Where there is reason to believe that an individual or another person is at immediate risk of significant harm, appropriate safeguarding action will be taken without unnecessary delay, even where this requires sharing information without consent. Wherever possible, the individual will be informed of this decision unless doing so would increase the level of risk.

Within Clinical Supervision, disclosures relating to a supervisee's client will be explored reflectively, with consideration given to safeguarding responsibilities, ethical decision-making and appropriate action. Responsibility for responding to the disclosure remains with the supervisee and, where applicable, their employing organisation. The Clinical Supervisor's role is to support reflective practice, promote professional accountability and ensure that safeguarding responsibilities are understood and appropriately addressed.

Key Principle

Every disclosure deserves to be heard with compassion, responded to with professionalism and managed in a way that protects the safety, dignity and wellbeing of those involved.

14. Information Sharing and Confidentiality

Sharing information lawfully, proportionately and in the best interests of those at risk.

Phoenix Therapy & Learning recognises that confidentiality is fundamental to developing safe, trusting and effective therapeutic and supervisory relationships. Individuals have the right to expect that information shared within therapy or Clinical Supervision will be treated with sensitivity and respect.

However, confidentiality is not absolute. There are circumstances where information must be shared to protect a child, young person or adult from abuse, neglect, exploitation or significant harm. Decisions regarding information sharing will always be guided by current legislation, statutory guidance, professional ethical frameworks and the welfare of the individual.

The limits of confidentiality are explained at the beginning of the therapeutic or supervisory relationship, ensuring individuals understand the circumstances in which information may need to be shared.

Information may be shared without consent where:

- there is a concern that a child, young person or adult is at risk of significant harm;
- there is a legal obligation to disclose information;
- sharing information is necessary to prevent serious harm to an individual or others;
- a court orders disclosure; or
- current safeguarding legislation or statutory guidance requires information to be shared.

Wherever possible and appropriate, individuals will be informed before information is shared. Information will be limited to that which is necessary, relevant, proportionate, accurate, timely and shared securely with those who have a legitimate safeguarding responsibility.

A clear record will be maintained of the information shared, the reasons for sharing, who received the information and the professional judgement supporting the decision.

Key Principle

Confidentiality promotes trust, but safeguarding responsibilities may require information to be shared lawfully, proportionately and in the best interests of protecting individuals from harm.

15. Recording Safeguarding Concerns

Maintaining accurate, factual and confidential records.

Phoenix Therapy & Learning recognises that accurate record keeping is an essential component of safe, ethical and accountable professional practice. Records relating to safeguarding concerns provide a clear account of observations, disclosures, professional judgement, decisions made, actions taken and subsequent outcomes.

Safeguarding information is recorded within the confidential record relating to the individual supervisee or client. Separate confidential records are maintained for each supervisee, adult client and teenage client to ensure information remains organised, accurate and confidential.

Records will be:

- Accurate, factual and contemporaneous.
- Completed as soon as reasonably practicable following a safeguarding concern or session.
- Dated and signed (or electronically authenticated).
- Clear in distinguishing factual observations, disclosures, professional judgement and actions taken.
- Stored securely in accordance with UK GDPR, the Data Protection Act 2018 and Phoenix Therapy & Learning's Confidentiality and Data Protection policies.

Where safeguarding concerns arise within Clinical Supervision, records will document the discussion, guidance provided, agreed actions and planned follow-up. Responsibility for safeguarding action remains with the supervisee and, where applicable, their employing organisation.

Where safeguarding concerns arise during Adult Therapy, Therapeutic Work with Teenagers or SandStory Therapy, records will document the presenting concern, factual observations or disclosures, safeguarding decisions, actions taken, consultation with other professionals, referrals and follow-up where appropriate.

Safeguarding records will be retained and disposed of in accordance with current legislation, professional guidance and Phoenix Therapy & Learning's Record Retention Policy.

Key Principle

Good safeguarding records are factual, timely, accurate and securely maintained. They provide a clear account of professional decision-making and support the safety and wellbeing of those accessing Phoenix Therapy & Learning services.

16. Consent and Mental Capacity

Balancing individual autonomy with safeguarding responsibilities.

Phoenix Therapy & Learning recognises the importance of respecting an individual's right to make informed decisions about their own care and personal information. Consent is central to ethical therapeutic practice and is sought wherever appropriate. Individuals will be provided with clear, accessible information about the nature of the service, confidentiality, the limits of confidentiality, and how their personal information may be used or shared.

Consent should be given freely, be informed and specific to the decision being made. Individuals have the right to ask questions, withdraw consent and make informed choices about their therapeutic journey wherever this is lawful and does not place themselves or others at significant risk of harm.

Phoenix Therapy & Learning also recognises that there are circumstances in which safeguarding responsibilities override the need for consent. Information may be shared without consent where there is a legal obligation to do so, where disclosure is required by a court, or where sharing information is necessary to protect a child, young person or adult from abuse, neglect, exploitation or significant harm. Wherever possible and safe to do so, individuals will be informed if information needs to be shared without their consent.

When working with adults, Phoenix Therapy & Learning will have regard to the principles of the Mental Capacity Act 2005. Every adult will be presumed to have capacity unless there is reason to believe otherwise. Capacity is recognised as being both decision-specific and time-specific. Where there are concerns regarding an individual's capacity to make a particular decision, appropriate professional guidance, consultation and relevant legislation will inform any safeguarding response.

Where an individual lacks the mental capacity to make a specific decision, any action taken will be in their best interests, applying the principles of the Mental Capacity Act 2005 and considering the least restrictive option appropriate to the circumstances.

When working with teenagers, Phoenix Therapy & Learning recognises that young people may have increased capacity to understand and participate in decisions affecting them. Their views will be listened to and respected wherever appropriate. However, safeguarding responsibilities remain paramount, and decisions will always prioritise the young person's safety and welfare in accordance with current legislation and professional guidance.

Within Clinical Supervision, supervisees are encouraged to reflect upon issues relating to consent, confidentiality, capacity and safeguarding as part of ethical decision-making. The Clinical Supervisor provides reflective support and professional challenge

where appropriate, while responsibility for obtaining consent and implementing safeguarding actions remains with the supervisee and, where applicable, their employing organisation.

Phoenix Therapy & Learning is committed to balancing respect for individual autonomy with a professional duty to protect those who may be at risk. Decisions will always be guided by current legislation, ethical practice, professional judgement and the welfare of the individual.

Key Principle

Consent supports autonomy, whilst safeguarding protects wellbeing. Phoenix Therapy & Learning seeks to balance both with compassion, professionalism and careful ethical decision-making.

SECTION FOUR

Specific Safeguarding Responsibilities

Recognising and responding to specific safeguarding risks in accordance with current legislation, professional guidance and best practice.

Safeguarding

Safeguarding concerns can present in many different forms and may affect children, young people and adults across all stages of life. Whilst the principles of safeguarding remain consistent, certain forms of abuse, exploitation and harm require additional awareness because they are supported by specific legislation, statutory guidance or recognised safeguarding procedures.

This section outlines the specific safeguarding risks that may arise within the work of Phoenix Therapy & Learning. It is not intended to provide an exhaustive description of every safeguarding issue, but to demonstrate an awareness of key areas of risk and the professional responsibilities associated with recognising, responding to and managing safeguarding concerns.

Phoenix Therapy & Learning is committed to maintaining current safeguarding knowledge, responding to concerns in a timely and proportionate manner, and ensuring that all safeguarding decisions are guided by professional judgement, reflective practice and the welfare of the individual.

17. Prevent Duty

Recognising vulnerability to radicalisation and supporting the prevention of extremism.

Phoenix Therapy & Learning recognises that radicalisation is a safeguarding concern that can affect children, young people and adults from any background, culture, faith or community. Vulnerability to extremist influences often develops through a complex combination of personal, social and emotional factors and should always be considered within the wider context of an individual's circumstances.

Where concerns arise, Phoenix Therapy & Learning will respond calmly, respectfully and without discrimination, recognising that beliefs alone do not constitute safeguarding concerns. Attention will instead focus upon vulnerability, risk, behaviour and the need to protect individuals from harm.

Where appropriate, safeguarding advice will be sought, concerns will be recorded accurately, and information will be shared lawfully with relevant safeguarding agencies where necessary to protect an individual or others.

Within Clinical Supervision, supervisees will be supported in reflecting upon safeguarding concerns relating to radicalisation, ethical decision-making and appropriate referral pathways. Responsibility for safeguarding action remains with the supervisee and, where applicable, their employing organisation.

Key Principle

The Prevent Duty is a safeguarding responsibility that seeks to protect vulnerable individuals from exploitation into extremism. Phoenix Therapy & Learning responds with fairness, respect and proportionate safeguarding action.

18. Female Genital Mutilation (FGM)

Recognising and responding to concerns relating to Female Genital Mutilation.

Phoenix Therapy & Learning recognises that Female Genital Mutilation (FGM) is a serious form of abuse and a criminal offence within the United Kingdom. FGM causes significant physical and psychological harm and should always be regarded as a safeguarding concern.

Concerns may arise through direct disclosure, emotional presentation, behavioural changes or information shared by families or other professionals. Some individuals may disclose historical experiences, whilst others may be at risk of the procedure taking place.

Phoenix Therapy & Learning will respond sensitively and respectfully whilst ensuring that safeguarding responsibilities remain paramount. Where concerns indicate that a child or young person may be at risk, appropriate safeguarding procedures will be followed without delay, seeking advice and sharing information where legally and professionally required.

Within Clinical Supervision, discussions relating to FGM will focus upon safeguarding responsibilities, legal duties and appropriate referral pathways whilst maintaining reflective practice and professional accountability.

Key Principle

Female Genital Mutilation is a serious safeguarding concern requiring prompt, compassionate and legally informed action that prioritises the safety and wellbeing of the individual.

19. Child Sexual Exploitation (CSE)

Recognising and responding to concerns relating to Child Sexual Exploitation.

Phoenix Therapy & Learning recognises that Child Sexual Exploitation (CSE) is a form of child sexual abuse in which children or young people are manipulated, groomed or coerced into sexual activity for the benefit of another person or group.

Children experiencing exploitation may not recognise themselves as victims and may appear to be participating willingly. Safeguarding therefore requires practitioners to look beyond behaviour and consider vulnerability, power imbalance and the wider circumstances surrounding the young person's experiences.

Where concerns arise, Phoenix Therapy & Learning will respond calmly and without judgement, listen carefully to disclosures, maintain accurate records, seek safeguarding advice where appropriate and share information lawfully with relevant agencies when necessary to protect a child from harm.

Within Clinical Supervision, supervisees will be supported in recognising indicators of exploitation, exploring safeguarding responsibilities and making informed decisions regarding appropriate safeguarding action.

Key Principle

Children affected by sexual exploitation require protection rather than judgement. Phoenix Therapy & Learning is committed to recognising vulnerability, promoting safety and supporting recovery.

20. Child Criminal Exploitation (CCE)

Recognising and responding to concerns relating to Child Criminal Exploitation.

Phoenix Therapy & Learning recognises that Child Criminal Exploitation (CCE) is a form of abuse in which children and young people are manipulated, groomed or coerced into criminal activity for the benefit of another individual or organised group.

Children who appear to be offending may themselves be victims of exploitation. Safeguarding therefore requires practitioners to consider the wider context surrounding behaviour and to recognise that criminal activity may be the result of grooming, coercion or control.

Where concerns arise, Phoenix Therapy & Learning will respond with professional curiosity, maintain clear records, seek appropriate safeguarding advice and share information where necessary to protect the child or young person.

County Lines is one form of Child Criminal Exploitation; however, exploitation may also involve theft, financial crime, organised criminal activity, forced offending or other forms of criminal behaviour.

Within Clinical Supervision, supervisees will be supported in recognising exploitation, exploring safeguarding responsibilities and identifying appropriate safeguarding responses.

Key Principle

Children involved in criminal activity may themselves be victims of exploitation. Phoenix Therapy & Learning is committed to recognising vulnerability and responding in ways that promote protection rather than blame.

21. County Lines

Recognising and responding to concerns relating to County Lines exploitation.

Phoenix Therapy & Learning recognises that County Lines is a specific form of Child Criminal Exploitation in which organised criminal groups exploit children, young people and vulnerable adults to transport, store or supply illegal drugs and carry out other criminal activities.

Those involved may experience grooming, intimidation, violence, debt bondage or coercive control and frequently do not recognise themselves as victims.

Where safeguarding concerns arise, Phoenix Therapy & Learning will respond promptly, maintain professional curiosity, record concerns accurately and work collaboratively with safeguarding agencies where appropriate.

Within Clinical Supervision, discussions relating to County Lines will focus upon recognising exploitation, understanding safeguarding responsibilities and supporting supervisees in making proportionate safeguarding decisions.

Key Principle

County Lines is a form of exploitation, not a lifestyle choice. Safeguarding responses should prioritise protection, support and recovery for those who are vulnerable to criminal exploitation.

22. Domestic Abuse

Recognising and responding to concerns relating to domestic abuse.

Phoenix Therapy & Learning recognises that domestic abuse can affect adults, children and young people, either through direct experience or by witnessing abuse within the family environment. Domestic abuse may involve physical, emotional, psychological, sexual or financial abuse, as well as coercive or controlling behaviour.

Therapeutic work or Clinical Supervision may reveal concerns relating to current or historical domestic abuse. Individuals may minimise, normalise or feel unable to disclose their experiences due to fear, shame, dependency or ongoing coercion.

Where concerns arise, Phoenix Therapy & Learning will respond with empathy, maintain professional boundaries, assess immediate safeguarding risks where appropriate, record concerns accurately and seek advice or make referrals where necessary to protect those at risk.

Within Clinical Supervision, supervisees will be supported in recognising the impact of domestic abuse, considering safeguarding responsibilities and reflecting upon appropriate interventions and referral pathways.

Key Principle

Domestic abuse is a safeguarding issue that affects individuals, families and communities. Phoenix Therapy & Learning is committed to recognising its impact and responding with compassion, professional accountability and appropriate safeguarding action.

23. Online Safety and Digital Safeguarding

Promoting safe and responsible practice within digital environments.

Phoenix Therapy & Learning recognises that digital technology forms an important part of modern life and that children, young people and adults may experience safeguarding risks through online activity. These risks may include online grooming, exploitation, cyberbullying, harassment, coercive control, inappropriate sexual communication, financial exploitation, exposure to harmful content or the misuse of digital platforms.

Phoenix Therapy & Learning is committed to maintaining safe professional boundaries within all digital communications. Online therapeutic and supervisory sessions will be conducted using secure platforms that support privacy and confidentiality. Digital records will be stored securely in accordance with current data protection legislation and organisational policies.

Where online activity gives rise to safeguarding concerns, Phoenix Therapy & Learning will respond in the same manner as concerns arising within face-to-face practice, recognising that safeguarding responsibilities remain unchanged regardless of the method of communication.

Within Clinical Supervision, practitioners will be encouraged to reflect upon the ethical, professional and safeguarding considerations associated with digital practice, including confidentiality, professional boundaries, record keeping and online risk.

Key Principle

Digital technology creates new opportunities for connection, learning and therapeutic support, but safeguarding responsibilities remain the same. Phoenix Therapy & Learning is committed to promoting safe, ethical and professionally responsible online practice.

SECTION FIVE

Safe Professional Practice

Maintaining safe, ethical and accountable practice across all services provided by Phoenix Therapy & Learning.

Safeguarding

Safeguarding extends beyond recognising abuse and responding to concerns. It is reflected in the professional standards, ethical decision-making and day-to-day practice that underpin every therapeutic and supervisory relationship.

Phoenix Therapy & Learning is committed to creating an environment in which children, young people, adults and supervisees experience services that are safe, respectful, professionally accountable and ethically informed. This commitment is achieved through maintaining clear professional boundaries, protecting confidentiality, promoting equality and inclusion, engaging in reflective practice and ensuring that all aspects of professional practice are consistent with current legislation, professional guidance and recognised ethical standards.

This section outlines the professional responsibilities that support safe practice across all services provided by Phoenix Therapy & Learning. Together, these responsibilities strengthen public confidence, promote professional integrity and ensure that safeguarding remains embedded throughout every aspect of practice.

24. Professional Boundaries

Maintaining safe, respectful and ethical therapeutic and supervisory relationships.

Professional boundaries are fundamental to creating safe, effective and ethically responsible therapeutic and supervisory relationships. They provide clarity, consistency and trust, enabling clients and supervisees to engage confidently within a professional environment that promotes safety, respect and wellbeing.

Phoenix Therapy & Learning is committed to maintaining clear professional boundaries throughout all therapeutic and supervisory relationships. Boundaries protect both the individual accessing the service and the practitioner, ensuring that professional judgement remains objective and that services are delivered ethically and consistently.

Professional boundaries include, but are not limited to:

- Maintaining appropriate therapeutic and supervisory relationships at all times.
- Working within recognised professional competence and scope of practice.
- Providing clear information regarding services, fees, confidentiality and professional expectations.
- Avoiding dual or conflicting relationships that may impair professional judgement or create a conflict of interest.
- Maintaining appropriate communication through agreed professional channels.
- Using social media and digital communication in a manner that protects confidentiality and professional integrity.
- Recognising and managing the impact of transference, countertransference and parallel process where relevant to therapeutic or supervisory work.
- Seeking Clinical Supervision whenever professional or ethical dilemmas arise.
- Maintaining accurate, confidential and professional records.

Phoenix Therapy & Learning recognises that boundaries are not barriers to building strong therapeutic relationships. Rather, they create the safe, consistent framework within which trust, reflection and meaningful therapeutic work can develop.

Any concerns regarding professional boundaries will be addressed promptly, ethically and in accordance with professional standards, safeguarding responsibilities and the relevant ethical framework.

Key Principle

Professional boundaries create the conditions in which safe, trusting and effective therapeutic relationships can flourish. They protect the wellbeing of clients, supervisees and practitioners alike while supporting ethical and accountable practice.

25. Online Working

Providing safe, ethical and secure therapeutic and supervisory services within digital environments.

Phoenix Therapy & Learning recognises that online therapy and Clinical Supervision provide accessible, flexible and effective ways of delivering professional services. The same ethical, professional and safeguarding responsibilities that apply to face-to-face practice also apply when services are delivered remotely.

Online sessions are conducted using secure and appropriate digital platforms that support privacy and confidentiality. Every reasonable effort is made to minimise risks associated with remote working whilst maintaining a safe and professional therapeutic environment.

To promote safe online practice, Phoenix Therapy & Learning will:

- Use secure, password-protected technology and platforms appropriate for professional practice.
- Explain the practical arrangements for online sessions, including confidentiality, privacy and the management of technical difficulties.
- Encourage clients and supervisees to participate from a private, quiet environment where they are unlikely to be overheard or interrupted.
- Confirm emergency contact details and, where appropriate, the individual's location at the beginning of online sessions to enable an appropriate response should a safeguarding concern or medical emergency arise.
- Maintain the same professional standards, ethical boundaries and record keeping as would apply within face-to-face practice.
- Respond appropriately to safeguarding concerns arising during online sessions in accordance with this policy.
- Ensure electronic records and communications are stored securely in accordance with UK GDPR, the Data Protection Act 2018 and Phoenix Therapy & Learning's Data Protection Policy.

Where an online session is interrupted due to technical difficulties, every reasonable effort will be made to re-establish contact promptly. If there are immediate concerns regarding an individual's safety or wellbeing and contact cannot be restored, appropriate safeguarding procedures will be followed based upon the information available.

Phoenix Therapy & Learning regularly reviews digital working practices to ensure that online services remain safe, secure and consistent with current professional guidance and recognised standards of good practice.

Key Principle

Safe online practice relies upon the same professional standards, ethical responsibilities and safeguarding principles that underpin all therapeutic and supervisory work, supported by secure technology and clear communication.

26. Equality, Diversity and Inclusion

Promoting an inclusive, respectful and equitable therapeutic environment for all.

Phoenix Therapy & Learning is committed to providing services that are inclusive, welcoming and accessible to all individuals. Every person will be treated with dignity, compassion and respect, regardless of age, disability, race, ethnicity, religion or belief, sex, gender identity, sexual orientation, marriage or civil partnership, pregnancy or maternity status, socio-economic background or any other protected characteristic.

Phoenix Therapy & Learning recognises that experiences of discrimination, prejudice, trauma and social inequality may increase vulnerability and can significantly affect an individual's emotional wellbeing, sense of safety and access to support. These experiences will be acknowledged sensitively and considered as part of a holistic understanding of the individual's circumstances.

Therapeutic and supervisory practice is underpinned by a commitment to:

- Promoting equality of opportunity and fair access to services.
- Respecting the individuality, identity, culture, beliefs and lived experiences of every client and supervisee.
- Recognising and valuing diversity as an important aspect of therapeutic and professional relationships.
- Challenging discrimination, prejudice and oppressive practice whenever it is identified.
- Reflecting upon personal values, assumptions and potential unconscious bias through ongoing professional development and Clinical Supervision.
- Making reasonable adjustments wherever practicable to support accessibility and participation.

Phoenix Therapy & Learning is committed to fostering an environment in which individuals feel psychologically safe to express themselves without fear of judgement or discrimination. Differences will be respected, diversity will be valued, and practice will remain person-centred, culturally responsive and ethically informed.

Key Principle

Every individual has the right to access services that are respectful, inclusive and free from discrimination. Phoenix Therapy & Learning is committed to creating therapeutic and supervisory relationships where diversity is valued, individuality is respected and everyone is treated with dignity and fairness.

27. Whistleblowing

Promoting openness, accountability and professional integrity.

Phoenix Therapy & Learning is committed to maintaining the highest standards of professional conduct, ethical practice and safeguarding. Whistleblowing is recognised as an important safeguard that enables concerns about unsafe, unethical or unlawful practice to be raised appropriately, ensuring that the welfare of children, young people and adults remains paramount.

Whistleblowing refers to the disclosure of genuine concerns regarding the conduct, practice or behaviour of an individual or organisation that may place others at risk of harm or compromise professional standards.

Phoenix Therapy & Learning encourages concerns to be raised promptly where there is reasonable belief that:

- Safeguarding responsibilities are not being appropriately fulfilled.
- A child, young person or adult may be at risk of harm.
- Professional or ethical standards are being seriously compromised.
- There is evidence of unlawful, fraudulent or unsafe practice.
- Individuals are being placed at unnecessary risk through poor professional conduct.

Where concerns arise, Phoenix Therapy & Learning will:

- Consider the concern carefully and objectively.
- Seek advice or consultation where appropriate.
- Raise concerns through the appropriate professional or organisational channels.
- Maintain accurate and confidential records of concerns raised and actions taken.
- Cooperate fully with any investigation undertaken by statutory agencies, employers, regulatory bodies or professional organisations.

Phoenix Therapy & Learning recognises that raising concerns can be difficult. Individuals who raise genuine concerns in good faith should be treated fairly and respectfully and should not be disadvantaged for acting in the interests of safeguarding and public protection.

Within **Clinical Supervision**, supervisees are encouraged to reflect openly upon professional concerns and ethical dilemmas. Where concerns indicate that unsafe practice may place individuals at risk of harm, appropriate action should be taken in

accordance with professional guidance, organisational procedures and legal responsibilities.

Key Principle

Safeguarding is strengthened by professional honesty, accountability and the willingness to raise genuine concerns when safety or professional standards may be compromised.

28. Allegations Against the Practitioner

Responding professionally, transparently and responsibly to concerns regarding professional conduct.

Phoenix Therapy & Learning recognises that allegations or concerns may occasionally be raised regarding the conduct or professional practice of any practitioner. Whilst such situations are uncommon, they must always be taken seriously and managed with openness, fairness and professional accountability.

Any allegation relating to the conduct, behaviour or professional practice of Phoenix Therapy & Learning will be responded to promptly, objectively and in accordance with current legislation, professional guidance and the relevant ethical framework.

Where an allegation suggests that a child, young person or adult may have been harmed, or is at risk of harm, Phoenix Therapy & Learning will:

- Prioritise the safety and wellbeing of the individual concerned.
- Cooperate fully with any safeguarding enquiries or investigations.
- Seek advice from the appropriate safeguarding authority, professional body or legal adviser where necessary.
- Notify the appropriate professional indemnity insurer where required.
- Maintain accurate, factual and confidential records of all concerns, actions and outcomes.
- Comply with any reporting responsibilities required by law or by the relevant professional body.

Phoenix Therapy & Learning recognises the importance of balancing the rights and welfare of all individuals involved. Allegations will be managed fairly, objectively and without prejudice, ensuring that decisions are based upon available evidence rather than assumption or speculation.

Where appropriate, professional support, consultation and Clinical Supervision will be sought throughout the process to ensure that safeguarding responsibilities, professional standards and ethical obligations continue to be met.

Phoenix Therapy & Learning is committed to learning from concerns, complaints or investigations, using reflective practice to strengthen professional standards and continually improve the safety and quality of services provided.

Key Principle

Professional accountability requires openness, fairness and a willingness to respond constructively whenever concerns are raised. Phoenix Therapy & Learning is committed to protecting those who access its services through transparency, ethical practice and continual professional learning.

29. Record Retention and Data Protection

Protecting personal information through secure and responsible record management.

Phoenix Therapy & Learning is committed to protecting the privacy, confidentiality and security of all personal information obtained through therapeutic work, Clinical Supervision and professional practice. Personal information is collected, stored, used and disposed of in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant legislation.

Separate confidential records are maintained for each supervisee, adult client and teenage client. Records are managed securely to maintain confidentiality, support continuity of care and demonstrate professional accountability.

Phoenix Therapy & Learning is committed to:

- Collecting only information that is necessary for the safe and effective delivery of services.
- Maintaining accurate, factual and contemporaneous records.
- Storing paper and electronic records securely with appropriate safeguards against unauthorised access, loss or damage.
- Restricting access to confidential information to Phoenix Therapy & Learning unless disclosure is required by law or necessary to safeguard an individual or others from significant harm.
- Retaining records in accordance with current legislation, professional guidance and organisational record retention procedures.
- Disposing of confidential records securely once the appropriate retention period has expired.

Individuals have the right to request access to their personal information, subject to any legal or professional limitations that may apply.

Phoenix Therapy & Learning regularly reviews information management practices to ensure that confidential information continues to be handled lawfully, securely and responsibly.

Key Principle

Respect for confidentiality extends beyond the therapeutic relationship. Phoenix Therapy & Learning is committed to protecting personal information through secure, lawful and professionally accountable record management.

30. Therapeutic Executor

Ensuring continuity of care in the event that professional services cannot continue.

Phoenix Therapy & Learning recognises the importance of planning for unforeseen circumstances that may prevent the continuation of therapeutic or supervisory services, including serious illness, incapacity or death.

A nominated **Therapeutic Executor** has been identified to assist in the responsible management of confidential professional records and the appropriate communication with clients and supervisees should Phoenix Therapy & Learning become unexpectedly unable to continue practising.

The role of the Therapeutic Executor is limited to ensuring that professional responsibilities are managed appropriately and may include:

- Informing clients and supervisees that services are unable to continue.
- Providing information regarding the secure management or lawful disposal of confidential records.
- Facilitating the transfer of records where legally appropriate and authorised.
- Providing information regarding alternative sources of therapeutic or supervisory support where appropriate.
- Ensuring that all actions are undertaken in accordance with confidentiality, data protection legislation and professional ethical standards.

The Therapeutic Executor does not assume responsibility for providing ongoing therapy or Clinical Supervision unless separately qualified, contracted and agreed with those involved.

Key Principle

Planning for unforeseen circumstances is part of responsible professional practice. Phoenix Therapy & Learning is committed to ensuring that clients and supervisees are treated with dignity, respect and continuity of care should services unexpectedly come to an end.

31. Policy Review

Maintaining a safeguarding framework that reflects current legislation, guidance and best practice.

Phoenix Therapy & Learning is committed to ensuring that this Safeguarding and Protection Handbook remains accurate, relevant and reflective of current legislation, statutory guidance, professional ethical frameworks and recognised best practice.

This handbook will be formally reviewed **annually**, or sooner where there are significant changes in legislation, safeguarding guidance, professional standards or the services provided by Phoenix Therapy & Learning.

Reviews will consider:

- Changes in safeguarding legislation and statutory guidance.
- Updates to professional ethical frameworks.
- Learning arising from safeguarding concerns, complaints or significant incidents.
- Changes to professional practice or services provided.
- Feedback received from clients, supervisees or professional colleagues where appropriate.

Where amendments are made, the handbook will be updated accordingly, and version control records will be maintained to provide a clear history of revisions.

Phoenix Therapy & Learning is committed to continuous learning and reflective practice, recognising that safeguarding is an evolving area of professional responsibility requiring ongoing review and development.

Key Principle

Safeguarding is an ongoing commitment rather than a one-time document. Regular review ensures that Phoenix Therapy & Learning continues to provide safe, ethical and professionally informed services.

SUPPORTING INFORMATION

Supporting safe, ethical and professionally accountable practice.

SUPPORTING INFORMATION

The following appendices provide practical information that supports the implementation of this Safeguarding and Protection Handbook. They are intended to complement the policies and procedures outlined throughout this document and should be read alongside current legislation, statutory guidance, professional ethical frameworks and organisational policies where applicable.

Phoenix Therapy & Learning recognises that safeguarding is an evolving area of professional practice. These supporting resources will therefore be reviewed and updated alongside this handbook to ensure they remain current, accurate and reflective of best practice.

Appendix A

Useful Safeguarding Contacts

The following organisations provide safeguarding advice, guidance and support. Contact details should be reviewed regularly to ensure they remain current.

National Contacts

- Emergency Services – **999**
- Non-Emergency Police – **101**
- NSPCC Helpline
- Childline
- Local Authority Children's Services
- Local Authority Adult Social Care
- Local Safeguarding Children Partnership (LSCP)
- Local Safeguarding Adults Board (SAB)
- NHS 111
- Samaritans

Professional Organisations

- British Association for Counselling and Psychotherapy (BACP)
- Play Therapy UK (PTUK)
- Professional Standards Authority for Health and Social Care (PSA)
- Information Commissioner's Office (ICO)

(Contact numbers and website details should be updated as required.)

Appendix B

Legislation, Statutory Guidance and Professional Standards

Phoenix Therapy & Learning maintains this handbook in accordance with current UK legislation, statutory guidance and recognised professional standards. The following documents have informed the development of this handbook.

Legislation

- Children Act 1989
- Children Act 2004
- Care Act 2014
- Mental Capacity Act 2005
- Mental Health Act 1983 (as amended)
- Domestic Abuse Act 2021
- Female Genital Mutilation Act 2003
- Serious Crime Act 2015
- Counter-Terrorism and Security Act 2015
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Human Rights Act 1998
- Equality Act 2010

Statutory Guidance

- Working Together to Safeguard Children (latest edition)
- Keeping Children Safe in Education *(where applicable)*
- Care and Support Statutory Guidance
- Prevent Duty Guidance

Professional Guidance

- BACP Ethical Framework for the Counselling Professions *(latest edition)*
- PTUK Ethical Standards
- Information Commissioner's Office (ICO) guidance

- National Institute for Health and Care Excellence (NICE) guidance where relevant

Phoenix Therapy & Learning recognises that legislation and professional guidance are regularly updated. The most current versions of these documents will always take precedence.

Appendix C

Record Retention Schedule

Phoenix Therapy & Learning retains confidential records in accordance with current legislation, professional guidance and recognised best practice. Records are retained only for as long as necessary to meet legal, professional and clinical requirements before being securely destroyed.

The retention periods below should be read alongside current professional guidance and legal requirements.

Record Type	Recommended Retention Period
Adult Therapy Records	In accordance with current professional guidance and legal requirements
Teenage Client Records	In accordance with current professional guidance and legal requirements
Clinical Supervision Records	In accordance with current professional guidance and legal requirements
Safeguarding Records	Retained as part of the individual's confidential record
Financial Records	In accordance with HMRC requirements
Consent Forms	Retained with the individual's confidential record

At the end of the retention period, confidential records will be securely destroyed or permanently deleted using methods appropriate to the storage format.

Appendix D

Document Version Control

Phoenix Therapy & Learning is committed to ensuring that this handbook remains accurate, current and reflective of best practice.

A record of all significant amendments will be maintained below.

Version	Date	Summary of Changes	Author	Review Due
Version 1.1	Oct 2026	Reviewed and updated to reflect current BACP and PTUK ethical and professional guidance	Karen Durkin	Oct 2026
Version 1.0	July 2026	Initial publication of Safeguarding and Protection Handbook	Karen Durkin	July 2027

Future amendments will be recorded within this table to provide a transparent history of policy development and review.

Closing Statement

Safeguarding is more than responding to concerns or following procedures. It is about creating professional relationships in which children, young people and adults feel physically, emotionally and psychologically safe to explore, reflect and seek support.

At Phoenix Therapy & Learning, safeguarding is strengthened through reflective practice, professional curiosity, ethical decision-making and collaborative working. These principles underpin every aspect of therapeutic work, Clinical Supervision and professional practice.

Phoenix Therapy & Learning is committed to maintaining the highest standards of safeguarding by continually developing professional knowledge, engaging in regular Clinical Supervision, working within current legislation and professional guidance, and placing the welfare of every individual at the centre of all decision-making.

Safeguarding is a shared responsibility. Through safe relationships, professional accountability and thoughtful practice, Phoenix Therapy & Learning strives to promote the safety, dignity and wellbeing of every person accessing its services.

Phoenix Therapy & Learning

Where creativity and reflection deepen practice.

Helping reflective practitioners bring creativity into professional practice.