

<p>CONFIDENTIAL COUNSELLING POLICY 2025 – 2030 Adopted October 2025</p>	
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The signatures below certify that this document has been reviewed and accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensure their provision.

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These Policies take account of the laws prevailing in all the GL countries of operation. Should there be a contradiction between the Policies and national laws, the later shall take precedence except where, in the interest of fairness, policies have been standardised across countries. All GL staff, associates and consultants are bound by GL Policies through their contracts. This policy should be read together with all relevant policies. This policy should be read in conjunction with GL’s HR Policies and Procedures, as well as the organisation’s Safeguarding Policy.

A. Introduction

1. As an organisation that advances gender equality and justice, Gender Links often works with people in very vulnerable situations, such as survivors of gender based violence, young women, people with disability, members of the Lesbian, Gay, Bisexual, Trans and intersex communities, sex workers and others, who regularly face stigma and discrimination. Many Gender Links programmes support and empower people in such vulnerable situations to challenge community norms and speak out in various fora.
2. Gender Links has noted in several of its programmes that there is a need to address mental health issues affecting programme participants.
3. Access to confidential counselling is a critical element of empowerment for people in vulnerable situations. This is important for the individuals to be able to build their self-esteem to challenge stigma and misconceptions and to succeed in economic endeavours, advocacy, access and adherence to SRHR, medication etc. Access to quality counselling is, therefore, important for the success of GL programmes.
4. Counselling support under this policy refers to short-term psychosocial counselling, emotional support, and referral assistance. It does not constitute clinical psychiatric treatment or long-term psychotherapy. Where specialised mental health care is required, counsellors must refer clients to appropriate clinical services.

B. Purpose of the confidential counselling policy

The purpose of the confidential counselling policy is to guide Gender Links and partner staff in supporting the mental wellbeing of people in vulnerable situations that they are working with. Specifically, this policy guides GL and partner staff in supporting people that they are working with to access quality confidential counselling.

This policy establishes the standards and procedures governing the provision of confidential counselling services within programme activities. The policy ensures that counselling support is delivered in a manner that is:

- Ethical, professional and safe
- Confidential and rights-based
- Accessible and inclusive
- Aligned with recognised Mental Health and Psychosocial Support (MHPSS) standards

The policy aims to protect the wellbeing, dignity, and safety of all participants while ensuring accountable and quality counselling services.

C. Scope

This policy applies to:

- Programme staff facilitating referrals to counselling
- Any GL or partner staff providing counselling to programme participants
- Any external counselling providers recommended by GL or partner programmes

All programme staff that work directly with people in vulnerable situations or who support partners that are working with people in vulnerable situations need to be aware of this policy and to ensure that its provisions are incorporated into programme delivery.

D. Access to confidential counselling:

1. As GL recognises the importance of mental wellbeing for the people in vulnerable situations that it works with, all programme facilitators (whether these are GL or partner staff) will be trained in basic psychological first aid (PFA), and will be able to refer any of the people that they are working with to identified counsellors. All programmes will make information about confidential counselling available to the people that they are working with so that they can choose to access this support even without referral.
2. Within GL, the People Team lead is available to provide confidential counselling to staff.
3. All GL and partner programmes will identify locally available counsellors that programme participants can be referred to or that participants can access. As much as possible such counselling shall be free for programme participants (e.g. the counsellors would be part of a free government or NGO service).

E. Selecting confidential counsellors¹

When selecting counsellors to whom programme participants will be referred, GL programmes will consider:

1. That the counsellors are sensitive to the issues that are faced by the people in vulnerable situations that GL is working with and able to support these programme participants to address and overcome challenges such as stigma that confront them, without being judgemental. GL will consider that counselling should prioritise safety and avoid causing further psychological or social harm. Counsellors recognise the effects of trauma and create a supportive and empowering environment.
2. Counsellors may be qualified professional counsellors or trained lay counsellors. Programmes should know which level the counsellors are as this determines what they can offer. Professional counsellors may provide clinical assessments, trauma counselling and longer-term therapeutic interventions. Lay counsellors may provide structured psychosocial support, emotional support and coping strategies, psychoeducation, guidance on wellbeing and resilience, referral for more specialised support and to community based support groups.
3. The training (either as professional or as lay counsellors) that counsellors have received and ensure that they have the requisite skills, access to refresher training and regular supervision to be up to date. GL will consider whether counsellors are registered with a national professional body and which code of conduct the counsellors adhere to.
4. That the counsellors will maintain confidentiality of the people that are referred to them,

¹ see Annex 1 Counsellor Due Diligence Checklist

and will notify the client when there is a need to break confidentiality in the interests of safety (e.g, a client who is being abused or who may be a risk to themselves or others and must be referred for immediate further support). Client safety takes priority over confidentiality when there is imminent risk of harm. Confidentiality will only be broken with the consent of the client.

5. That the counsellors have a safe and secure system for keeping records that will maintain confidentiality, with protocols for how long records will be kept and how they are disposed. Session notes will have minimal personal details about clients.
6. That the counsellor understands their boundaries and when they need to refer a client to others, such as specialised mental health providers, health or police, for further support. The counsellor should have an established procedure, which includes contact details for different providers, to facilitate such referrals.
7. That the counsellor will maintain a professional relationship with people that are referred to them.
8. That the wellbeing of counsellors is given due attention. This includes having a manageable caseload, having access to regular supervision, participation in team and group activities to alleviate the stress of their job and being encouraged to participate in activities for self-care.
9. Whether counselling will be in person, telephonic or through another medium. If counselling is in person, that the premises that the counsellor operates from is accessible, with private space for counselling, and safe.

F. Procedure for access to confidential counselling:

1. A programme participant may be referred by a programme facilitator for counselling or may choose to access counselling on their own.
2. Access to counselling is voluntary. Programme participants may be referred or encouraged to participate but must choose to do so. Programme participants should be given enough information about the counsellor to whom they are being referred to enable them to make an informed choice to access the service. When a participant is referred they should sign a consent form for the referral, indicating that they understand what the service involves (See Annex 2 Informed Consent Form). If a programme participant is a child (under the age of 18) the child's parents or caregivers should give consent for the referral to counselling. There may be exceptions to caregiver consent if there are child protection concerns.
3. When a programme participant chooses to access counselling there should be a signed counselling contract with the counsellor, which includes the purpose of counselling, agreed number of sessions, time and dates of sessions and when the counselling will end. Both the client and the counsellor should commit to participating in the sessions. The contract should also cover confidentiality, when confidentiality may be broken, and keeping of records. (See Annex 3: Counselling contract template)

4. The client has the right to terminate counselling but should notify the counsellor that they are terminating.

G. Follow up to referrals for confidential counselling:

1. Facilitators who refer programme participants for counselling have a responsibility to follow up with the participant to find out if they accessed the counselling, and if they were satisfied with the service that they received.
2. Any complaints about the counselling service should be followed up with the counsellor and, where necessary, their supervisor or other authorities. Participants must not face retaliation for raising concerns.
3. Facilitators should keep records of referrals of programme participants for counselling and notes about the satisfaction of participants with the service.
4. Where services are not satisfactory the programme should identify alternative confidential counsellors.

H. Monitoring and Review

This policy will be reviewed periodically to ensure alignment with emerging MHPSS best practices and programme needs.

ANNEX 1

Counsellor Due Diligence Checklist

Before engaging counsellors, the programme should verify:

Criteria	Verified
Sensitive to the challenges that confront programme participants, creates an empowering environment, free from stigma and discrimination	<input type="checkbox"/>
Relevant counselling training or qualification for level of counselling offered, with access to continuing training	<input type="checkbox"/>
Professional registration (if applicable)	<input type="checkbox"/>
Experience providing counselling services, maintains confidentiality, has a secure record keeping system	<input type="checkbox"/>
Agreement to professional code of ethics	<input type="checkbox"/>
Access to supervision	<input type="checkbox"/>
Awareness of referral pathways and availability of contact details for referrals	<input type="checkbox"/>
Attention is paid to the wellbeing of counsellors	<input type="checkbox"/>
If in person counselling that the premises are accessible, safe and have private space for counselling.	<input type="checkbox"/>

ANNEX 2

Informed Consent Form

Confidential Counselling Services

You are being offered the opportunity to participate in confidential counselling. Counselling provides a safe and supportive space to talk about personal challenges, stress, emotional wellbeing, or difficult experiences. The aim is to support coping, wellbeing, and access to appropriate services if needed. Counselling provided through this programme is short-term psychosocial support and is not psychiatric treatment or long-term psychotherapy.

Counselling is voluntary.

You have the right to:

- Ask questions about counselling
- Decline to answer any question
- Stop counselling at any time
- Request a different counsellor where someone else is available
- Raise concerns or complaints about counselling services

Refusing counselling will not affect your participation in programme activities or access to other services.

Consent Statement

Please read the statement below and sign if you agree.

I confirm that:

- I have read or had this information explained to me.
- I understand the purpose of counselling.
- I understand that I can stop counselling at any time.
- I voluntarily agree to participate in counselling.

Participant Name: _____

Signature: _____

Date: _____

Facilitator Name: _____

Signature: _____

Date: _____

Additional Section (For Participants Under 18)

Parent / Guardian Consent

I confirm that I am the parent or legal guardian ofand give permission for them to participate in counselling.

Parent / Guardian Name: _____

Signature: _____

Date: _____

Relationship to Participant: _____

ANNEX 3

Counselling Contract Template

This document outlines an agreement regarding counselling between (the counsellor) and(the client).

It has been agreed that confidential counselling will involve:

- of counselling sessions.
- The sessions will be conducted in person, by phone, or online (delete those which are not applicable)
- Sessions will be held on(day) at(time).
- Sessions usually lastminutes.

Confidentiality

Everything that is shared during counselling will be treated as confidential. Personal information will not be shared without permission.

However, confidentiality may be broken if:

- There is a serious risk of harm to the client or another person
- The client gives explicit permission for information to be shared with another service provider for referral purposes.

If this happens, only the minimum necessary information will be shared.

Record Keeping

Counsellors will keep brief confidential notes to support professional practice.

These notes:

- Are stored securely
- Are accessible only to the counsellor (and supervisor if applicable)
- Will not be shared with the programme organisation

Risks and Benefits

It is understood that counselling may help the client to:

- Understand their experiences
- Develop coping strategies
- Improve emotional wellbeing
- Access other services if needed

However, discussing difficult experiences may sometimes bring up strong emotions. The client may choose to pause or stop the session at any time.

Referral to Other Services

If the client requires specialised support, the counsellor may suggest referral to other services. Referrals will normally only occur with the client's consent, unless there is an immediate safety concern.

Complaints or Concerns

If the client has concerns about counselling services, you may contact:

Programme focal point: _____

Email / Phone: _____

All complaints will be treated confidentially and investigated appropriately.

Agreed and signed by:

Participant Name: _____

Signature : _____

Date: _____

Counsellor Name: _____

Signature: _____

Date: _____