



Twin Willows Therapy

Anna Wheeler: Counsellor Registered Member MBACP
 Certified Play Therapist and Qualified Supervisor
www.twinwillowstherapy.com
 Email: twinwillowscentre@annawheeler.co.uk
 Mobile: 07921 554588

All Policies 2026 to be reviewed annually

***Confidentiality Policy 2026 to be reviewed annually**

I will keep all information the client discloses confidential, with the following exceptions:

- If I have reason to believe that the client or anyone else is in danger of serious harm to themselves or others, or a child is at risk, I reserve the right to consult with outside agencies. I will endeavour, where possible, to discuss it with the client first, unless the client discloses information about certain criminal or terrorist offences, when I have a professional obligation to tell outside agencies without informing the client first.
- Counsellors and play therapists are required to have regular supervision and I reserve the right to disclose some details of the sessions with the supervisor. The client's name will not be disclosed.
- In the unlikely event of being subpoenaed I would have to give evidence in court

***Child/ Adult at Risk Protection Policy 2026 to be reviewed annually**

If I suspect that a child, young person (under 18) or an adult at risk has been abused or is at risk of any type of abuse I will consult with my supervisor and any relevant agencies. I follow the guidance of the local safeguarding board.

If a Child, Young Person or Vulnerable Adult/Adult at Risk makes a disclosure of abuse, I will listen, not ask any leading questions, and inform the client that I shall have to pass the information on to the relevant agencies as a part of normal inter-agency working. An up-to-date record will be kept in the client's file. The client will be offered support regarding any subsequent interviews, meetings or hearings. I will follow up on any safeguarding concerns.

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 Date..... Client.....Yes/No
 or Relationship to Client.....



Health and Safety Policy 2026 to be reviewed annually

The client will be told the location of toilets, and emergency exit and fire drill for any building that they are in for a counselling, play therapy or supervision session. Any therapy space will be regularly assessed for health and safety risks and risk assessments undertaken. The play and creative arts therapy/creative counselling kit will be checked before each session and reviewed every three months for health and safety reasons.

***Lone Working Policy 2026 to be reviewed annually**

The therapist will work in a building with other adults nearby, or those with parental responsibility being nearby, and in agreement to offer any necessary support so that in the rare circumstances of difficult behaviour or medical emergency, there will be assistance available, whilst the relevant medical services are alerted. The therapist has standard necessary medical information regarding the clients, to be ready for any medical emergencies.

***Whistleblowing Policy 2026 to be reviewed annually**

In addition to the BACP professional body guidance regarding flag up any concerns about a fellow therapy professional, I follow government guidelines for whistleblowing and the LADO procedures. [Whistleblowing for employees: What is a whistleblower - GOV.UK](https://www.gov.uk/guidance/whistleblowing-for-employees)

***Complaints Policy 2026 to be reviewed annually**

I am a member of the British Association for Counselling and Psychotherapy (BACP). I conduct my counselling, certified play therapy and supervision practice within the BACP 'Ethical Framework for Counsellors', and also the BACP Guidelines for Online Counselling and Psychotherapy. Information relating to both of these documents can be found at www.bacp.co.uk .

If at any point within my service you felt that I am in breach of these codes of ethics, I would hope that you feel comfortable to discuss this with me and that we could find a resolution to the situation. If we were unable to do so, I will provide you with contact details if you do not already have them, where you could express your concerns directly to the BACP. You can approach the BACP and quote name and my registration number, 56334.

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***Environmental Policy 2026 to be reviewed annually**

I Aim to: Continually improve the environmental performance by monitoring progress against targets and objectives on a regular basis; Prevent pollution and reduce the impact on the environment; Comply with relevant environmental legislation.

***Equality, Diversity and Inclusion 2026 to be reviewed annually**

I work in private practice offering face-to-face and online counselling, play therapy and supervision. I have worked with clients across all age ranges, from age 4, up to and beyond retirement age. I have the fullest commitment to offering a service which is welcoming to all backgrounds in a supportive and non-discriminatory manner.

I have commitment to addressing issues of prejudice and discrimination in relation to the mental well-being, neurodiversity, political belief, gender and gender identity, sexual preference or orientation, disability, marital or partnership status, race, nationality, ethnic origin, heritage, identity, religious or spiritual identity, age or socio-economic class of individuals and groups, in accordance with the 2010 Equality Act.

***Online Counselling and Therapy 2026 to be reviewed annually**

Online counselling provides an opportunity to explore a personal difficulty in a confidential and supportive environment. Online Counselling can provide you with the opportunity to access counselling support at a time and in a place which is convenient to you and be supported in trying to find a positive way forward with personal issues or concerns. I have attended training in online counselling and play therapy and online and telephone counselling and supervision. I can offer you an agreement which explains the set-up for counsellor/therapist and client for online work.

***Social Media Policy 2026 to be reviewed annually**

To maintain my clients' privacy and confidentiality, protect the therapeutic relationship and restrict any disclosure of confidential information in the social media world my policy is to: Never disclose any information about my clients or their families on any social media forum and never engage with a client on social media. I keep my professional and personal lives separate with very high privacy settings. If I were to use any anonymous testimonials on any social media sites or my own website, I would ensure that I have the client's written permission. I do not ask clients to write a review on LinkedIn or Facebook; I will not be able to respond to any friendship or other contact requests with clients or their families, past and present.

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***Precis Safeguarding Policy 2026 to be reviewed annually**

In the event of any disclosures, safeguarding concerns or risks, the procedures will follow the up-to-date guidelines and relevant organisations will be contacted. The correct person in various settings could be the school or college designated safeguarding officer, LADO, MARU for children and young people under 18, or SPoA for adults in Cornwall, or their local safeguarding authorities for any online work outside of the county. In the case of out of hours disclosures or concerns, the relevant out of hours service will be contacted. For children, the updated Child Safeguarding information will be used, at present see [Cornwall and the Isles of Scilly Safeguarding Children Partnership - Home page](#) and <http://www.proceduresonline.com/swcpp/>. If there are any concerns about mental capacity these will be discussed with the clinical supervisors and the relevant Mental Health Team advisors (CMHT and CAMHS), and signpost to them and/or follow their advice. I am trained at the minimum level, for my work across the ages, by an FAA Level 3 in Principles of Safeguarding and Protecting Children, Young People and Vulnerable Adults, attained in 2021, a lifelong qualification with regular updates.

***Expanded Safeguarding Policy 2026 to be renewed annually**

The purpose and scope of this policy statement

The overall aims of this organisation are to offer therapeutic services to children, young people and adults at risk and the activities it carries out to fulfil this aim include counselling, play therapy, parent-child work, supervision, training and contributing to advisory panels.

The purpose of this policy statement is:

- to protect children, young people and adults at risk, who receive Anna Wheeler’s therapy services, directly from harm. This includes the children of adults who use the services.
- to provide children and young people and their families, with the overarching principles that guide our approach to child protection. Likewise for adults at risk. This policy applies to Anna Wheeler as a sole trader.

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Client Yes/No

Relationship to client:



Expanded Safeguarding Policy Con:

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children and adults at risk in England. A summary of the key legislation and guidance for children is available from [nspcc.org.uk/child protection](http://nspcc.org.uk/child-protection). This includes being in accordance with current legislation (reference to and be consistent with Care Act 2014, Care Act statutory guidance on Safeguarding in Chapter 14, Safeguarding Vulnerable Groups Act 2006, Mental Capacity Act 2005, Children Act 1989 (Revised 2004) and Working Together to Safeguard Children 2015. It is also in accordance with the South West Child Protection Procedures and web pages: <http://www.proceduresonline.com/swcpp/>

Supporting documents

This policy statement should be read alongside the organisational policies, procedures, guidance and other related documents:

- role description for the designated safeguarding officer, Anna Wheeler, (see rest of Expanded Safeguarding Policy)
- dealing with disclosures and concerns about a child or young person (see Confidentiality Policy)
- responding to allegations (see Complaints Policy)
- recording concerns and information sharing (see GDPR and Privacy Policy)
- child protection records retention and storage (see GDPR Policy which includes the ICO registration number, updated every March on the ICO renewal system)
- code of conduct for Anna Wheeler (see BACP for code of conduct and Ethical Framework)
- behaviour codes for children and young people are covered in the session guidance (any Concerning Behaviours will be considered in context and with supervisory and other professional advice)
- photography and sharing images guidance (see GDPR Policy)
- safer recruitment not needed, but can be activated is appropriate
- online safety (see OPT Policy)

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Expanded Safeguarding Policy Con:

- anti-bullying policy is not needed, but can be activated if appropriate
- managing complaints (see Complaints Policy)
- whistleblowing (see Whistleblowing Policy)
 - health and safety (see Health and Safety Policy)
- Continuing Professional Development training, refresher training on GDPR, Safeguarding, First Aid, PREVENT, and other CPD relevant for professionals working in the child and adult therapy sector, clinical supervision and support.

The minimum training is Level 3 Award in Principles of Safeguarding and Protecting of Children, Young People and Vulnerable Adults, which is a lifelong qualification with updates, which Anna Wheeler achieved on 8th September 2021 with First Aid Awards Ltd. and she has kept up with updates.

Anna Wheeler is on the update service for DBS. The latest certificates are within the last 3 years, both enhanced were Adults: 20th Feb 2026 and Children 4th March 2026 and will be reviewed on their anniversary dates each year by the update service and accessible via the date and issue number. Issue numbers can be provided upon request.

- adult to child supervision ratios (see Lone Working Policy).

We believe that:

- children, young people and adults should never experience abuse of any kind
- we have a responsibility to promote the welfare of all children, young people and adults, to keep them safe and to practise in a way that protects them.

Include the process for identifying, assessing and managing risk associated with Safeguarding concerns: follow the Cornwall and IOS safeguarding board guidelines. Report to the relevant professional bodies, such as MARU and SPoA (see Lone Working, Professional Boundaries BACP). If a client or parent/carer/professional is concerned about the therapist/supervisor, they can follow the same guidance.

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Clear procedure for responding to safeguarding concerns (including details of where and how to log concerns and subsequent actions).

MARU and SAP can be reached by telephone and email and an online form filled in detailing the details of the concern. For clients online and out of county, their local safeguarding teams will be contacted by the therapist/supervisor. A record will be kept on file for any children, young people of adults using the service along with any follow up responses and actions. Other professionals such as schools' DSO's may also need to be informed.

This is communicated to service users via this policy (and if any staff or volunteers were to be taken on, this would be included in their induction training and be always accessible). The service would co-operate fully and transparently with safeguarding professionals.

Essential local contacts include:

MARU (Multi-Agency Referral Unit 0300 123 1116, online via website: [Child protection and safeguarding - Cornwall Council](#), email multiagencyreferralunit@cornwall.gov.uk

SPoA Single Point of Access for Adults, 0300 1234 131, and 01208 251300 for out of hours. For phone numbers for the six areas of Cornwall see [Integrated community mental health teams](#) and for online portal forms, email is adultsafeguardingconcerns@cornwall.gov.uk or for an online approach use the website [Safeguarding adults - Cornwall Council](#)

We recognise that:

- the welfare of children and adults (at risk) are paramount in all the work we do and in all the decisions we take
- working in partnership with children, young people, their parents, carers and other agencies are essential in promoting young people's welfare

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Expanded Safeguarding Policy Con:

- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse; likewise with adults at risk
- some children and adults are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- extra safeguards may be needed to keep children and adults who are additionally vulnerable safe from abuse.

This includes:

- safeguarding children and adults who come from Black, Asian, minoritised ethnic communities and impoverished communities from all ethnicities
- safeguarding d/Deaf and disabled children, young people and adults
- safeguarding LGBTQ+ children, young people and adults
- safeguarding children and adults with special educational needs and disabilities (SEND).

We will seek to keep children, young people and adults safe by:

- valuing, listening to and respecting them
- adopting child protection and child, young person and adult safeguarding best practice through our policies, procedures, ethical framework and a code of conduct
- developing and implementing an effective online safety policy and related procedures
 - access regular and effective support through supervision, support, training and quality assurance measures so that all policies, procedures and behaviour codes are followed confidently and competently and updated annually

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Expanded Safeguarding Policy Con:

- recruiting and selecting staff and volunteers is not applicable for this service at present, but appropriate policies and procedures would be put in place if this ever changed. This would include references, ongoing DBS checks and minimum safeguarding training and updates of Level 3 for child, young person and adult work. There would be HR policy procedures and a code of conduct/Ethical Framework that relate to staff members guilty of misconduct likely to lead to abuse, exploitation or neglect.
- recording and storing and using information professionally and securely, in line with data protection legislation and guidance [more information about this is available from the Information Commissioner's Office: ico.org.uk/for-organisations; this register includes Anna Wheeler, see the GDPR and Privacy Policy for the details and the ICO registration number]
- sharing information about safeguarding and good practice with children and their families, young people and adults via leaflets, posters, group work and one-to-one discussions
- making sure that children, young people and their families and adults know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, adults at risk, parents, families and carers appropriately
- using our procedures to manage any allegations appropriately
- creating and maintaining an anti-bullying environment is not applicable, but if this changes, there will be a policy and procedure to help us deal effectively with any bullying if that does arise
- ensuring that we have effective complaints and whistleblowing measures in place, such as the BACP and any other professional bodies (see the Complaints Policy, Whistleblowing Policy). The BACP require members to raise concerns with other members if needed with the BACP. Clients and supervisees are shown policies that detail how to contact the BACP if they are concerned about a therapist's or supervisor's behaviours including safeguarding or have any complaints.

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Expanded Safeguarding Policy Con:

- ensuring that we provide a safe physical environment for our children, young people, and adults at risk by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where children, young people and their families, and adults treat each other with respect and are comfortable about sharing concerns.

Contact details: Nominated Child Protection Lead and Adults at Risk Lead

Name: Anna Wheeler

Phone/email: 07921554588

Encrypted email: twinwillowstherapy@pm.me

This policy was last reviewed on: 30/03/2026 Policy to be reviewed on 30/03/2027

***Privacy and GDPR Policy 2026 to be reviewed annually**

The provider, Anna Wheeler, can confirm that they have arrangements in place, such as an annually renewed ICO registration and the registration number is included in the Privacy Notices for clients, each one being appropriate for each three age ranges of 0-12, 13-17 and 18+. This service also has the suggested audit system for data control and processing which would assist in monitoring potential data breaches. Annual refresher training is also in place, which would include analysis and guidance for data breaches and all aspects of privacy and GDPR requirements. The provider would aim to maintain internal procedures for detection, assessment, and mitigation of any breaches. The provider also uses preventative measures such as PIN and/or password protection for all devices, encrypted emails and video platform use, email mistake clauses in the email signatures and privacy policies appropriate for each age group.

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*Privacy and GDPR Policy Con: Data Breaches

The provider will follow the guidelines on data breaches which would include notifying the ICO within 72 hours if a breach poses a risk to individuals, notifying affected individuals without undue delay if the risk is high and internally documenting all breaches, even if not reportable. The notification to the ICO would include, where possible:

- Categories and approximate number of individuals affected
- Categories and approximate number of personal data records involved
- Name and contact details of the data protection officer or other contact
- Likely consequences of the breach and
- Measures taken or proposed to mitigate harm

The provider provides assurance that if it intends to use or does use cloud-based applications, such as Microsoft 365 or proprietary databases, that these systems will be or already are protected by Multi-Factor Authentication.

*All these policies are in accordance with current legislation (reference to and be consistent with Care Act 2014, Care Act statutory guidance on Safeguarding in Chapter 14, Safeguarding Vulnerable Groups Act 2006, Mental Capacity Act 2005, Children Act 1989 (Revised 2004) and Working Together to Safeguard Children 2015.

If you have any questions about any of the policies, do contact me face-to-face or by email.

Anna Wheeler (date) Signed: *Anna Wheeler* Date: 30/03/2026

Date for Review: 30/03/2027

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Client Yes/No Relationship to client: