Child protection and safeguarding policy

(including safer recruitment, allegations against staff and low-level concerns)

2026-2027

West of England Music & Arts

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Approved by:

Simon Lock, Chief Executive
Andrea William-Jones, Trustee

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Claire Schollick Tracy Breathnach	01454 582458 safeguarding@wema.org.uk
Local authority designated officer (LADO) *The relevant LADO is the one in the LA in which an event occurs	BANES LADO North Somerset LADO South Gloucestershire LADO	LADO@bathnes.gov.uk 07795 092629 01454 868508
Safeguarding Trustee	Andrea William-Jones	Refer to WEMA Business Manager for contact details

1. Aims

West of England Music and Arts (WEMA) aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's (DfE's) statutory guidance Keeping Children Safe in Education (KCSIE) 2026 and Working Together to Safeguard Children (2023), the Maintained School's Governance Guide and Academy Trust Governance Guide. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see section 3).

This policy is also based on the following legislation:

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- The Crime and Policing Act 2026, which changes the definition of regulated activity in relation to children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains WEMA's duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our trustees and CEO should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows WEMA to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

- The Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Making or sharing of nudes or semi-nudes is where children make or share nude or semi-nude images, videos or live streams. This includes images that are digitally altered or wholly generated by artificial intelligence (such as deepfakes), as well as pseudo-images that are computer-generated images that otherwise appear to be a photograph or video. All such incidents mandate a safeguarding response.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in KCSIE 2026 (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- The chief officer of police for a police area in the LA area

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Early Help encompasses both universal services and community-based early help, and targeted early help known as 'Family Help', which provides more intensive support for families with multiple or complex needs.

WEMA and the Company both mean West of England Music and Arts. This policy uses 'WEMA' when referring to our services, staff, centres and activities, and 'the Company' when referring to WEMA as a legal entity and employer – for example in relation to the Board of Trustees, employment matters, contracts and Company-wide approaches. The terms 'the Organisation', 'the Hub' and 'the Music Hub' are not used in this policy.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language (EAL)
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of female genital mutilation (FGM), sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and trustees of the Company and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures apply to all WEMA activity, in schools and elsewhere.

WEMA plays a crucial role in preventative education. This is in the context of a Company-wide approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment.

5.1 All staff

All staff will:

- Read and understand Part 1 of KCSIE 2026 **in its entirety** (the condensed version in Annex A has been removed) and review this guidance at least annually
- Complete the required eLearning KCSIE assessment to confirm all staff have reviewed the guidance.
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems that support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the WEMA designated safeguarding leads (DSL), school/setting DSLs, and the safeguarding response to children who go missing from education.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The fact that children can be at risk of harm inside and outside of their home, at WEMA activities and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.
- That a child and their family may be experiencing multiple needs at the same time.
- What to look for to identify children who need help or protection.
- The fact that harmful online interaction may include generative AI
- That modern slavery and financial exploitation are forms of harm that children may experience (refer to Appendix 4 for more detailed guidance)
- Child-to-parent or caregiver abuse as a safeguarding concern
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Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSLs are shown at the start of this document. The DSL takes lead responsibility for child protection and wider safeguarding. This includes online safety and understanding our filtering and monitoring processes on WEMA devices and WEMA networks to keep pupils safe online.

The DSL will be available during WEMA hours for staff to discuss any safeguarding concerns. Refer to your School / setting DSL in the first instance if applicable.

Refer to the Safeguarding Flowchart for contact details.

If the DSLs are not available, contact the Local Authority Safeguarding Duty Service or call the police if you feel the child is in immediate danger.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at WEMA
- Implement robust cover arrangements for when the DSL is unavailable (such as a confidential shared mailbox to ensure safeguarding concerns are received, monitored and acted on without delay)

The DSL will also:

- Keep the CEO informed of any issues
- Liaise with local authority case managers and designated officers for safeguarding concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare WEMA's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSLs are set out in their job description.

5.3 The Board of Trustees

The board will:

- Facilitate a Company-wide approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and WEMA's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the Board of Trustees. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that WEMA has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
    - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support WEMA in meeting these standards
- Make sure:
- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- Use of devices at WEMA and in settings is a running and interrelated theme within the Company-wide approach to safeguarding and related policies
    - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
    - WEMA has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
    - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on WEMA roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with WEMA about safeguarding arrangements, where appropriate
    - Make sure that safeguarding requirements are a condition of using WEMA premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of trustees will act as the 'case manager' in the event that an allegation of abuse is made against the CEO, where appropriate (see appendix 3).

All trustees will read KCSIE 2026 in its entirety.

Section 15 of this policy has information on how trustees are supported to fulfil their role.

5.4 The CEO

The CEO is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems that support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins WEMA and via the WEMA website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Overseeing the safe use of technology, mobile phones and cameras in the setting

6. Confidentiality

Refer to WEMA's 'Data Management Policy (sharepoint.com)'

You should note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act 2018, UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks WEMA not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment – for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

All staff are expected to recognise the signs of abuse, neglect and exploitation, and to be alert to the potential need for early help for a child who:

- Is disabled, has special educational needs (with or without an EHC plan), or is suffering from mental ill health
- Is a young carer, is bereaved, is privately fostered, has returned home to their family from care, or has a parent or carer in custody or affected by parental offending
- Is missing education or care, goes missing from home, is persistently absent from WEMA activity, or has experienced multiple suspensions or permanent exclusion
- Is at risk of exploitation – including criminal or sexual exploitation, modern slavery, trafficking, gangs and county lines, organised crime, or serious violence including knife crime
- Is at risk of radicalisation, or of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is affected by drug or alcohol misuse (their own, or in the family), adult mental health difficulties or domestic abuse, or is viewing harmful online content or forming unsafe relationships online

Staff, volunteers and trustees must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to local authority children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Complete the WEMA disclosure report form and follow the WEMA Safeguarding Flowchart to report to the school’s DSL.

Tell the WEMA DSL that you have made a report to the school/setting DSL

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and follow the appropriate steps in the WEMA safeguarding flowchart. Alternatively, if appropriate, make a referral to local authority children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child.

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

KCSIE 2026 explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any member of staff who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the school/setting DSL and involve local authority children's social care as appropriate.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out, or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

The WEMA Safeguarding Flowchart sets out the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the school/setting DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, we will report this to the school, and the WEMA DSL will contribute the information we hold – for example the child's attendance at and engagement with music activity, and any concerns our staff have raised.

WEMA will not act as lead practitioner for an early help assessment. That role sits with the school or the lead agency.

Referral

To maintain a single point of contact, the school's DSL will always be the first point of contact.

If an incident occurs during WEMA activities, or a child is not directly attached to a school or setting (including virtual school), report to the WEMA DSL and they will liaise with the School's DSL and Local Authority Designated Officer. Where appropriate, WEMA DSL will make a referral direct to the LADO.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which WEMA staff and trustees can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

7.5a Serious violence

Staff should be aware of the indicators that a child may be at risk from, or involved in, serious violence. This includes physical assault, carrying or threatening someone with a weapon, gang-related activity and county lines exploitation.

Risk is higher for children whose education has been disrupted by suspension, exclusion or a move to alternative provision, children with a history of offending, and children who are frequently absent. Risk is often greatest immediately after the school day, during travel to and from activities, and during unsupervised time.

Report any concern that a child is carrying, using or threatening to use a weapon to the school/setting DSL and the WEMA DSL immediately. If anyone is in immediate danger, call 999 first.

WEMA does not provide mentoring, therapeutic or family support services, and we should not promise them. Where a child needs that kind of help we will pass our concerns to the school/setting DSL, who can arrange it. What we can offer is a consistent, trusted adult and continued access to music – both of which are protective in their own right.

If staff have concerns about serious violence, follow the procedures in section 7.4.

7.6 If you have a concern about mental health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem, or be at risk of developing one. These include:

Self-harm, or expressions of suicidal thoughts or hopelessness

- Signs of disordered eating, or marked changes in eating patterns
- Anxiety, persistent low mood, or withdrawal from activities and relationships
- A significant change in behaviour, presentation or engagement
- Difficulty sleeping, or appearing persistently exhausted

WEMA does not provide counselling, therapy or other mental health interventions, and staff must not attempt to provide them. Where a child needs this support we will share our concerns with the school/setting DSL, who can arrange it, and – where appropriate and agreed with the DSL – signpost the family to their GP or local services.

If a child is in immediate danger:

If staff feel that a child is in immediate danger due to mental health concerns, they must:

- Call 999 if the child is at immediate risk of harm
- Stay with the child and do not leave them on their own
- Do not transport a child to hospital yourself – wait for the emergency services
- Inform the DSL as soon as possible
- Follow the safeguarding procedures in section 7.4

Access to Mental Health Support Teams:

Where a host school has a Mental Health Support Team (MHST) or pastoral lead, the school's DSL will decide whether to involve them. WEMA does not have its own MHST and cannot refer to one directly.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a WEMA member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the CEO as soon as possible. If the concerns/allegations are about the CEO, speak to the chair of trustees.

The CEO/ chair of trustees will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the CEO, report it directly to the local authority designated officer (LADO).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under WEMA's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in WEMA at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

You must record the allegation and tell the setting's (eg school) DSL, but do not investigate it. If an allegation is made at an out of school activity, record the allegation and tell the WEMA DSL but do not investigate it.

- Where the children involved are pupils at a host school, that school's DSL will lead the response and we will support them. Where the allegation arises at a WEMA centre or event, the WEMA DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL leading the response will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. Where WEMA organises transport, residentials or ensembles that bring the children together, the risk assessment will cover those settings
- The DSL will ask the school/setting DSL, or the family's GP, to consider a referral to child and adolescent mental health services (CAMHS) where that seems appropriate. WEMA cannot refer to CAMHS directly

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment at in- and out-of-school activities and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Set and reinforce clear expectations of respectful behaviour in our music sessions, and support the host school's curriculum on healthy relationships and consent rather than duplicating it
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to patterns in reports of sexual violence or harassment that may point to a wider problem, and raise these with the host school and, where appropriate, our safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
- How to recognise child-on-child abuse and respond to reports, and to keep an attitude of "it could happen here" even where nothing has been reported
- That victims often do not report directly – a concern may surface through a child's behaviour, through a friend, or in a conversation overheard – and that staff should act on concerns straight away rather than wait to be told
- That some children face additional barriers to telling someone because of vulnerability, disability, gender, ethnicity or sexual orientation, and that a child who harms a peer may be being abused themselves

- That they should speak to the DSL about any concern, and that social media is likely to feature in the fall-out from an incident, including contact between the children involved

Where the children involved are pupils at a host school, decisions about behaviour and discipline rest with that school; our role is to share information and support the school's response. Where an incident happens at a WEMA centre or event, the WEMA DSL will decide what action to take about a child's participation. Support will be provided alongside any such action.

Action can be taken while a police or children's social care investigation is ongoing, but we will take advice from them first so that we do not prejudice it.

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the making or sharing of nudes or semi-nudes, including images that are digitally altered or wholly generated by artificial intelligence (such as deepfakes), which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Where the incident arises during WEMA activity in a school, the school's DSL leads the response and we will support them. Where it arises at a WEMA centre or event, the WEMA DSL will hold an initial review, following the UKCIS guidance 'Sharing nudes and semi-nudes: advice for education settings'.

The review will establish whether any child is at immediate risk, whether a referral to the police and/or children's social care is needed, whether parents and carers should be involved (in most cases they should), and what support the children need. Images must not be viewed unless there is no other way to make a safeguarding decision, and must never be copied, shared or stored.

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident. See appendix 4 for more information on assessing adult-involved incidents
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the WEMA CEO and the host school's DSL, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will speak with the children involved where it is appropriate to do so. This is a safeguarding review, not an investigation.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done by dialling 101, or 999 in an emergency.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 15 of this policy also apply to recording these incidents.

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Make sure every session leader tells participants, at the start of a course or event, that they can speak to any WEMA adult about anything that worries them
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Display safeguarding information, including how to raise a concern and who our DSLs are, at WEMA centres and at WEMA-run events
- In schools and hired venues, where we cannot display our own information, session leaders will give this information verbally, and it will also be included in the course information we send to parents and carers

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, WEMA aims to:

- Protect and educate the whole WEMA community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones in WEMA, schools and settings

- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras when visiting schools / settings and music centres, for example that:
- Staff will follow guidelines as set out by:
- each school/setting, as appropriate; and
- WEMA's policies (for both in- and out-of-school activities).

Staff will not take pictures or recordings of pupils on their personal phones or cameras

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

8.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

Benefits and risks of AI:

WEMA recognises that AI has many uses, including:

- Enhancing teaching and learning
- Supporting administrative tasks
- Helping to protect and safeguard pupils through monitoring systems

However, AI may also have the potential to:

- Facilitate abuse (e.g. bullying and grooming)
- Expose pupils to harmful content
- Create 'deepfakes' – AI-generated images, audio or video hoaxes that look real
- Be used to create or manipulate nude or semi-nude images of children
- Generate misinformation or disinformation
- Enable new forms of child sexual abuse material

Safeguarding considerations:

Staff should be aware that:

- Making or sharing of nudes or semi-nudes now explicitly includes images created or altered by AI
- AI-generated content may be used in grooming, sexual exploitation, or bullying
- Children may not recognise AI-generated content as fake
- AI tools may bypass traditional filtering systems

Staff responsibilities:

Staff should:

- Be aware of the risks of using AI tools while they are still being developed
- Report any concerns about AI-generated harmful content through normal safeguarding channels
- Educate pupils about the risks and ethical use of AI

8.2 Use of Mobile Phones and Devices

Pupils/Participants:

During WEMA activities, we expect that:

- Mobile phones should be switched off and stored away during teaching and learning time
- Phones may be used during breaks at the discretion of the session leader
- Any use of phones to bully, harass, or share inappropriate content will be treated as a serious safeguarding concern

When working in schools/settings: WEMA staff will ensure pupils follow the host school's mobile phone policy.

When working in hired venues or WEMA centres: Session leaders will communicate expectations about phone use to pupils and parents at the start of activities.

Staff use of mobile phones:

- Staff should follow the host school's mobile phone policy but are advised not to use personal mobile phones during teaching time except in emergencies
- Staff must not take photographs or videos of children on personal devices
- WEMA or school devices should be used for any necessary recording, following our image consent procedures
- Staff should store personal phones securely and out of sight during sessions

Exceptions: Exceptions may be made for:

- Medical or care needs (e.g. diabetes monitoring)
- Specific learning needs where a device supports access
- Emergency contact situations

These exceptions should be agreed with the WEMA DSL and the host school, and documented.

9. Notifying parents or carers

This is down to the school/setting DSL, but where this concerns a matter handled by a WEMA DSL, where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so

We offer extra pastoral support for these pupils.

10.1 Young Carers

We recognise that young carers face particular vulnerabilities and safeguarding risks.

What staff should be alert to:

Young carers' caring responsibilities can impact on their:

- Attendance at in school/setting lessons and WEMA activities
- Attainment and participation
- Behaviour and wellbeing
- Physical and mental health
- Social relationships and development

Early identification:

Early identification of young carers is essential to make sure they receive appropriate support. Staff should be alert to signs that a child may have caring responsibilities, including:

- Frequent absences or lateness
- Tiredness or difficulty concentrating

- Anxiety about leaving activities or being away from home
- Taking on adult responsibilities
- Limited time for social activities or homework
- Concerns about discussing their home situation

Support for young carers:

When we identify a young carer, we will:

- Assess their needs and the impact of their caring role
- Provide appropriate support and adjustments
- Liaise with parents/carers and relevant agencies if necessary
- Ensure they can access the same opportunities as their peers

The DSL will take the lead in coordinating support for young carers.

10.2 Safeguarding Children with Medical Conditions

We recognise that children with medical conditions may face additional safeguarding vulnerabilities.

Staff should be aware that:

- Children with medical conditions may be at increased risk of abuse or neglect
- Medical needs may be fabricated or induced by a parent/carer
- Medication may be misused or withheld
- Children may be isolated due to their condition

Our approach:

We will follow updated guidance on supporting pupils at school with medical needs, and allergy safety, which includes:

- Training staff on specific medical needs
- Ensuring safe storage and administration of medication at any WEMA activities
- Being alert to safeguarding concerns related to medical care
- Working in partnership with health professionals and families to support the child at any WEMA activities

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

Where applicable and when schools/settings advise WEMA staff, we will ensure that WEMA staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

13. Pupils who are lesbian, gay, bisexual or gender questioning

This section should be read alongside Keeping Children Safe in Education 2026 (KCSIE 2026), Part Two, which contains the statutory guidance on children who are lesbian, gay or bisexual, on children who are questioning their gender, and on single-sex spaces and single-sex sports. Where a child attends a host school, that school's policy and decisions take precedence: WEMA will follow the approach the school has agreed with the child's parents or carers rather than making separate arrangements of its own.

13.1 LGBTQ+ Pupils

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children.

We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the Setting's DSL or WEMA DSL for WEMA activities.

Our approach:

We will:

- Take a strong, proactive stand against all forms of bullying, including homophobic, biphobic and transphobic bullying
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Reduce additional barriers faced by LGBTQ+ pupils
- Create a culture where pupils can speak out or share their concerns with members of staff
- Challenge any form of derogatory or discriminatory language or behaviour

Risks can be compounded where children lack trusted adults with whom they can be open.

13.2 Supporting Children Questioning Their Gender

Understanding the context:

We recognise that:

- Sometimes young children go through a period of questioning their gender, but for the majority this will not continue into adulthood
- Children questioning their gender may have complex mental health and psychosocial needs
- Some may have autism and/or attention deficit hyperactivity disorder (ADHD)
- They may face particular vulnerabilities, including in relation to relationships with family and peers

Our approach to support:

When supporting a child who is questioning their gender, we will:

- Take time to understand the thoughts and feelings of the child
- Be appropriately professionally curious

- Be aware of the potential vulnerabilities of these children
- Consider adopting policies that maintain flexibility and avoid rigid rules based on gender stereotypes
- Take a strong, proactive stand against all forms of bullying
- Consider the broad range of their individual needs

Parental involvement:

We will:

- Work in partnership with parents/carers when making decisions about support at WEMA activities **unless there are circumstances where doing this would constitute a greater risk to the child than not involving them**
- Encourage families/carers to seek clinical help and advice, particularly when supporting pre-pubertal children

Clinical support:

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

13.3 Social Transition

When social transition requests arise:

WEMA will:

- **Not initiate any action regarding social transition** - we will only respond if a child or their parent/carer specifically requests it
- Take a **'very careful approach'** in relation to accommodating social transition
- Exercise **'particular caution'** in primary settings, where support for full social transition should be agreed **'very rarely'**

Decision-making process:

Staff should **not adopt any changes relating to social transition unless a decision has been made by WEMA and the child's parents/carers have been involved** (except in exceptionally rare cases where doing so would pose a greater risk to the child).

Policy framework:

WEMA will consider whether pupils would be best supported by a policy on social transition that explains:

- The steps we'll take when a child requests support
- Our decision-making process
- How we'll involve parents/carers
- How we'll document decisions
- How we'll review arrangements

Legal compliance:

We must comply with our distinct but interacting obligations under:

- Safeguarding legislation
- Equality and human rights law

Any assessment of discrimination will be informed by our evaluation of the welfare and best interests of the child and other children.

Documentation:

We will:

- Document our decision-making process
- Keep records of all decisions and the rationale
- Review previous decisions regularly (see section 13.6)

13.4 Recording Biological Sex

Legal requirement:

WEMA is legally required to record a child's biological sex accurately wherever it is recorded. This includes:

- Admissions records
- Medical information systems (MIS)
- Safeguarding records
- Any other official documentation

This requirement applies regardless of any social transition support in place.

13.5 Single-Sex Facilities and Activities

Toilets, changing rooms and showers:

WEMA **must not allow children into toilets, changing rooms or showers designated for the opposite biological sex**. There are **no exceptions** to this requirement, including where we are responding to a request to support social transition.

Alternative facilities:

If a pupil who is questioning their gender doesn't want to use the toilet, changing rooms and showers designated for their biological sex, we will consider whether we can provide alternative facilities that:

- Don't compromise the provision of single-sex facilities
- Don't compromise the safety, comfort, privacy or dignity of the child or any other children
- Are individual, lockable rooms
- Open directly onto public areas (in the case of mixed-sex toilets)

Risk assessment:

Where we provide mixed-sex toilets in addition to single-sex toilets, we will:

- Assess safeguarding risks
- Plan accordingly to mitigate risks
- Ensure they meet the criteria above

Record-keeping:

We will:

- Keep a record of these situations
- Communicate them appropriately
- Review them regularly

Residential courses (if applicable):

The same requirements apply to residential accommodation. Children must not be placed in accommodation designated for the opposite biological sex.

If necessary, the DSL and Residential Lead will liaise, meeting with the parents/carers well in advance of the residential course to discuss safeguarding requirements.

13.6 Reviewing Decisions

We will regularly review any decisions made regarding support for children questioning their gender, including:

- Social transition arrangements
- Use of alternative facilities
- Participation in activities
- Any other support measures

Reviews will consider:

- The child's ongoing needs and wellbeing
- Any changes in circumstances
- Feedback from the child and their parents/carers
- Any clinical advice available
- The impact on the child and other children

13.7 Children 'living in stealth'

A child 'living in stealth' has socially transitioned from an early age, and their peers and the adults working with them may not be aware of their biological sex. The Cass Review, reflected in KCSIE 2026, found that these children are likely to approach puberty in a fearful and anxious state and may be particularly vulnerable to mental health difficulties.

WEMA may become aware that a child is living in stealth through their parents or carers, the child's school DSL, a transfer of safeguarding records from a previous provider, or the child's own disclosure. The WEMA DSL must be involved in every such case, and staff must not discuss the child's situation with anyone other than the DSL.

The DSL will:

- Meet the parents or carers to understand the child's situation, agree what information will be shared within WEMA, and agree how we will keep in touch
- Liaise with the child's school DSL, with parental consent, so that our approach is consistent with the school's
- Assess the child's needs in relation to the particular WEMA activities they attend, paying close attention to residential courses, changing for performances, and any overnight stay
- Agree a written support plan setting out who within WEMA needs to know (on a strict need-to-know basis), the practical arrangements for each type of activity, and how and when the plan will be reviewed
- Record all decisions and the reasons for them, and store them securely with WEMA's confidential safeguarding records

Information will be shared only with the WEMA staff who need it in order to keep the child safe – normally the DSL, the child's teacher, the leaders of any ensemble or course they attend, and staff responsible for residential arrangements. It will not be shared in general staff meetings, with other participants or their parents, or with visiting artists and guest tutors unless this is essential. The DSL will brief those staff individually, explain the reason for sharing and the need for confidentiality, and record who has been told and when.

The single-sex requirements in section 13.5 apply without exception, including on residential courses: a child must not use toilets, changing rooms, showers or accommodation designated for the opposite biological sex. Residential arrangements will be planned with the parents or carers at least four to six weeks in advance, and the decisions and reasons recorded.

Staff who work with the child should be alert to withdrawal from activities, anxiety about performances, changing or overnight stays, marked changes in mood or behaviour, and any sign of bullying, and must report any concern to the DSL immediately. Vigilance matters particularly as the child approaches and goes through

puberty. Where there are mental health concerns, the DSL will follow section 7.6 and involve the parents or carers, the school and, where necessary, children's social care or mental health services.

If the child's biological sex becomes known to others during a WEMA activity, the DSL will assess the immediate risk, contact the parents or carers and the school DSL, arrange support for the child, address any bullying under our anti-bullying procedures, and review the support plan before the child returns to activities.

Confidentiality is important, but it never takes priority over the child's welfare. Where the two conflict, the DSL will act in the child's best interests and follow the safeguarding procedures in section 7.

The DSL will review the support plan at least once a long term, before and after each residential course, and whenever circumstances change. If the child leaves WEMA for another music provider, the DSL will agree with the parents or carers what should be passed on and, with their consent, transfer it to the new provider's DSL.

Quick Reference Guide for WEMA Staff

If you're told a child is living in stealth:

✓ **Maintain absolute confidentiality** - do not discuss with anyone except the DSL

✓ **Understand this is safeguarding information** - the child is particularly vulnerable

✓ **Be alert to signs of anxiety or distress** - especially around puberty, changing facilities, or group situations

✓ **Report any concerns immediately to the DSL**

✓ **Support the child to participate fully in music-making** while keeping them safe

✓ **Never make assumptions** - follow the agreed support plan

Red flags - report to DSL immediately:

- The child seems very anxious or distressed
- The child is withdrawing from activities
- You're concerned about the child's mental health
- There's been any bullying or harassment
- The child's situation has become known to others
- You're unsure how to handle a practical situation
- The child has disclosed concerns to you

13.8 Supporting Children Who Wish to Detransition

We recognise that some children who have socially transitioned may later wish to detransition.

We will:

- Provide sensitive, non-judgmental support
- Liaise with parents/carers/school DSL appropriately
- Update records as appropriate
- Support the child through any changes
- Address any bullying or negative reactions from peers
- Review safeguarding and support arrangements

13.9 Staff Training and Support

All staff will receive training on:

- Supporting LGBTQ+ pupils
- Understanding the needs of children questioning their gender
- WEMA's policies and procedures
- Legal requirements
- Safeguarding considerations
- How to respond to requests for support

The DSL will ensure staff have access to appropriate guidance and can seek advice when needed.

14. Complaints and concerns about WEMA staff

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

14.2 Whistle-blowing

If you have a concern about another member of staff, contact the WEMA DSL. If the concern is about the DSL or CEO, report to the Designated Safeguarding Trustee. Contact details can be obtained from the WEMA Business Manager. Refer to the Safeguarding Concern or Disclosure Flowchart.

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left WEMA.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand WEMA's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.

All staff must read Part 1 of KCSIE 2026 in its entirety; the condensed version (previously Annex A) has been removed.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the Company-wide safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Have regard to the Teachers' Standards and HCPC Therapists Professional Standards of Proficiency to support the expectation that all teachers and therapists:
- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all pupils and therapy clients

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism, and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSLs

The DSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

The DSL will also receive training on:

- Implementing robust cover arrangements for when they are unavailable
- The new information-sharing duty and best practice in transferring child protection files
- Understanding the assessment process for Family Help
- Supporting children questioning their gender, including the legal requirements around social transition, single-sex facilities, and recording biological sex
- The updated requirements around filtering and monitoring reviews

16.3 Trustees

All trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support WEMA to deliver a robust Company-wide approach to safeguarding

As the chair of trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the CEO, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at WEMA will have undertaken safer recruitment training. This will cover, as a minimum, the contents of KCSIE 2026, including statutory checks and updated requirements, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring arrangements

This policy will be reviewed **annually** by the Designated Safeguarding Leads and the CEO. At every review, it will be approved by the Board of Trustees.

18. Links with other policies

This policy links to the following policies and procedures which can be found on the WEMA Intranet: www.wema.org.uk/intranet

- Child Safeguarding concern report form
- Safeguarding Reporting Flowchart
- Registering, dismissing and non-collection of pupils/clients
- Touching Students/Clients
- Data Management
- Digital Communications
- Electronic Devices
- Information and Data Security
- Social Media
- Staff Privacy Notice
- DBS policy
- Employee Assistance Programme
- Risk Assessment – In School
- Risk Assessment – Out of School
- Artificial Intelligence

These appendices are based on the Department for Education's statutory guidance, KCSIE 2026.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including:
    - **Assault by penetration** (for example, rape or oral sex) – this is when a person penetrates the vagina or anus of another person with a part of their body or anything else, without that person's consent
    - **Sexual assault -** this is when a person intentionally touches another person sexually without their consent
    - Other non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Abuse can take place wholly online or technology may be used to facilitate offline abuse.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)

- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our WEMA's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- Request applicants provide the following
    - personal details, current and former names, current address and national insurance number
    - details of their present (or last) employment and reason for leaving
    - full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
    - qualifications, the awarding body and date of award
    - details of referees/references (see below for further information), and
    - a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Whether they are known to the police and children's local authority social care
    - Whether they have been disqualified from providing childcare (see paras 268-272), and
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references before interview or, where appropriate, during the Conditional Offer of Employment period.. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is WEMA based, we will ask for the reference to be confirmed by the CEO as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in WEMA's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity

- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, CEO, Heads of subject, Programme Leads,.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school/setting/out of school activity, for teaching, training, instructing, caring for or supervising children
- **Teaching, training, instructing or supervising children frequently** (this is now regulated activity regardless of supervision)
- **Teaching, training, instructing or supervising children overnight or more than 3 days in a 30-day period** (this is regulated activity regardless of supervision)
- Carrying out paid, or unsupervised unpaid, work regularly in a school/setting/out of school activity where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not
- **Providing advice or guidance on physical, emotional or educational wellbeing**
- **Driving a vehicle only for children**

IMPORTANT: The 'supervision exemption' has been removed. Any volunteer frequently teaching, training, instructing, or supervising children is legally in regulated activity and requires an enhanced DBS check with children's barred list information.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at WEMA has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity (including those frequently teaching, training, instructing or supervising children)
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- **Where the contractor does not have opportunity for regular contact with children, we will decide whether a basic DBS check would be appropriate**

For self-employed contractors: We will either:

- Obtain the DBS check ourselves, or
- Request to see the certificate to ensure the DBS check is at the level required

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at WEMA.

Volunteers

Due to changes in the Crime and Policing Act 2026, **any volunteer who is frequently teaching, training, instructing or supervising children is in regulated activity** and must have an enhanced DBS check with barred list information.

We will:

- Obtain an enhanced DBS check with barred list information for all volunteers who are in regulated activity (including those frequently teaching, training, instructing or supervising children)

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006

The previous 'supervision exemption' no longer applies. Volunteers cannot be supervised to exempt them from regulated activity if they are frequently teaching, training, instructing or supervising children.

Trustees

All trustees will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All proprietors, trustees, will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

Due to changes in the Crime and Policing Act 2026, we will assess whether individuals supervising pupils on work experience are in regulated activity. This will depend on:

- The frequency of the supervision
- Whether the supervision involves teaching, training, or instructing
- The nature of the work experience placement

Where supervision constitutes regulated activity, we will ensure appropriate barred list checks are carried out.

For pupils under 16, we will be particularly careful to assess whether supervision arrangements constitute regulated activity.

Appendix 3: allegations of abuse made against staff

Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, **trainee teacher**, volunteer or contractor..., has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of schools /settings / WEMA activities.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the CEO, or the chair of trustees. Where the CEO is the subject of the allegation, the case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within WEMA so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in WEMA so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment, and parents/carers have been consulted
- Temporarily redeploying the individual to another role within the organisation. If in doubt, the case manager will seek views from WEMA's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at WEMA is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at WEMA and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in WEMA and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff can refer to their union representative or ask a colleague to support them. This could be a staff member or, if not involved in any investigation, their Line Manager. Access to our BUPA welfare line is also available.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If WEMA is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible WEMA will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in WEMA's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

- If there are concerns or an allegation is made against someone not directly employed by WEMA, such as a supply teacher, **trainee teacher**, or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

Shared safeguarding responsibilities:

- We recognise that we share active safeguarding duties regarding supply teachers, trainee teachers, and contracted staff, even though they are not directly employed by us.

Our approach:

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency or training provider whether it is appropriate to suspend the individual, or redeploy them to another part of WEMA, while WEMA carries out the investigation
- We will involve the agency or training provider fully, but **WEMA will take the lead** in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency or training provider are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency/provider where necessary)
- For trainee teachers, we will liaise with their training provider and ensure they are aware of our process

Information sharing:

When using an agency or working with trainee teachers, we will:

- Inform them of our process for managing allegations
- Keep them updated about our policies as necessary
- Invite the agency's HR manager, training provider representative, or equivalent to meetings as appropriate
- Share relevant information about the outcome of any investigation

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or WEMA ceases to use their services, or the individual resigns or otherwise ceases to provide their services, WEMA will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, WEMA will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

If the individual concerned is a **trainee teacher**, we will inform their training provider of the outcome and any implications for their continued training.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending WEMA.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, WEMA will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, WEMA will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

WEMA will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, WEMA will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions
- When providing references for supply teachers, trainee teachers, or contracted staff to their agency or training provider, we will follow the same principles outlined above

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to WEMA's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to WEMA that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside WEMA
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of WEMA may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in WEMA's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the CEO will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The CEO will use the information collected to categorise the type of behaviour and determine any further action, in line with WEMA's code of conduct. The CEO will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Developing and implementing a low-level concerns policy: A guide for organisations which work with children

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at WEMA

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

Assessing adult-involved incidents of making or sharing nudes and semi-nudes

All adult-involved incidents of making or sharing nudes and semi-nudes are child sexual abuse offences and must immediately be referred to the police or children's social care. However, because adult-involved incidents can present as child-on-child sharing, adult involvement may be difficult to assess at first.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material. Offenders may also use wholly AI-generated images (deepfakes) that appear to show the child or young person in sexual situations, even though no actual photograph was ever taken.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing an image, or the offender sharing a digitally manipulated or AI-generated image (deepfake) of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas, who are motivated only by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account

- Use digitally manipulated or wholly AI-generated images (deepfakes) of the child or young personThe offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked, digitally manipulated or AI-generated images (deepfakes) of the child or young personChildren who are absent from education

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school / setting
- Come from new migrant families

We will follow our procedures and DfE statutory guidance for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. This can include modern slavery, forced labour, or financial exploitation (such as being forced to hand over money or being involved in benefits fraud).

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education
- Being subjected to modern slavery or forced labour
- Being exploited financially (e.g., forced to hand over money, coerced into benefits fraud)

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to make or share nudes or semi-nudes of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. This includes images that have been digitally altered or wholly generated by artificial intelligence (such as 'deepfakes'). CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images. In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child-to-Parent or Caregiver Abuse

We recognise that some children may direct abusive behaviour towards their parents or caregivers. This can include physical violence, emotional or psychological abuse, financial abuse, and coercive controlling behaviour.

Staff should be aware that:

- This form of abuse can occur in any family
- It may be hidden due to shame or fear
- Children displaying this behaviour may themselves have experienced trauma or abuse
- Parents/carers may need support and should not be blamed

If staff become aware of child-to-parent abuse, they should report concerns to the DSL following the procedures in section 7 of this policy.

Child-on-child abuse

Understanding the continuum from harmful sexual behaviour to sexual violence:

Child-on-child sexual abuse exists on a continuum, from harmful sexual behaviour (HSB) through sexual harassment to sexual violence. It's important to understand this progression:

Harmful Sexual Behaviour (HSB):

- HSB is sexual behaviour displayed by children that is developmentally inappropriate or harmful
- It exists on a continuum from normal sexual development and exploration to highly abusive behaviour
- Not all HSB is abusive, but all requires a response
- Staff should be aware of typical stages of sexual development (resources available from NSPCC)
- Early intervention can prevent escalation to more serious abuse

Sexual Harassment:

- Sexual harassment sits between HSB and sexual violence on the continuum
- It includes unwanted conduct of a sexual nature
- It can be verbal, physical, or online
- It creates an intimidating, hostile, degrading, humiliating or offensive environment

Sexual Violence:

- This is the most serious end of the continuum
- It includes rape, assault by penetration, and sexual assault
- These are criminal offences

Understanding consent:

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

A child under the age of 13 can never consent to any sexual activity. Sexual activity with a child under 13 should always result in a child protection referral.

The age of consent is 16. Sexual intercourse without consent is rape.

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school /settings. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our WEMA has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about WEMA's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to local authority children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to**:**

- Negate or destroy the fundamental rights and freedoms of others; or
- Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- Intentionally create a permissive environment for others to achieve the results outlined in either of the above points**Terrorism** is an action that:
- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools / settings have a duty to prevent children from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children at WEMA from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at WEMA and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools / settings / out of school activities

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same setting.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the setting that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about WEMA's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups

- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Modern Slavery and Financial Exploitation

- Modern slavery encompasses human trafficking, forced labour, and domestic servitude. Children can be victims of modern slavery and may be:
- Trafficked into the UK or moved around within it
- Forced to work in various settings including cannabis farms, nail bars, car washes, or as domestic servants
- Subjected to sexual exploitation
- Used for criminal activities
- Financial exploitation involves manipulating or coercing a child to gain access to their money, property, or financial resources. This can include:
- Forcing children to hand over money or possessions
- Using a child's bank account for money laundering
- Coercing children into debt
- Exploiting children through online scams or cryptocurrency fraud
- **Indicators may include:**
- Signs of physical abuse or malnourishment
- Appearing frightened, withdrawn, or showing signs of trauma
- Lack of personal possessions or identification documents
- Being collected and dropped off at unusual times
- Having money or possessions they cannot account for
- Unexplained bank accounts or financial transactions
- If staff suspect modern slavery or financial exploitation, they must report this to the DSL immediately, who will follow local safeguarding procedures and may need to contact the police and/or the Modern Slavery Helpline on 08000 121 700.

Young Carers

- A young carer is a child who provides care for a family member who has a physical or mental illness, disability, or substance misuse problem. Young carers may:
- Take on practical and/or emotional caring responsibilities that would normally be expected of an adult
- Miss out on education, social activities, and opportunities for development
- Experience emotional distress and physical strain
- Staff should be aware that young carers may:
- Be frequently absent or late to sessions
- Appear tired or struggle to concentrate
- Have difficulty completing work or participating fully
- Show signs of stress or anxiety
- Be reluctant to discuss their home situation
- We will work to identify young carers and ensure they receive appropriate support. This may include liaising with local young carers' services and ensuring the child's needs are considered in any early help or safeguarding assessments.

Children with Specific Medical Conditions

- Children with specific medical conditions may face additional safeguarding vulnerabilities, including:
- Increased risk of bullying or discrimination
- Potential for medical neglect if their condition is not properly managed
- Risk of fabricated or induced illness
- Emotional and psychological impacts of living with a chronic condition
- Dependency on adults for medical care, which could create opportunities for abuse
- Staff should:
- Be aware of any pupils with significant medical conditions
- Understand how these conditions might create additional vulnerabilities
- Be alert to signs that a child's medical needs are not being met
- Report any concerns through normal safeguarding channels

Checking the identity and suitability of visitors

Visitors are expected to sign in and wear a visitor's badge.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into WEMA activity venues any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using WEMA facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

Staff should refer to the separate policy on non-collection of children on the WEMA Intranet.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing:

Staff should refer to the separate policy on missing pupils on the WEMA Intranet

Temporary Accommodation Notification Duty

Local housing authorities have a duty to notify the relevant local authority children's social care team when they accommodate a child under 16 (or under 18 if the child has a disability) in temporary accommodation.

The DSL should be aware that:

- Children in temporary accommodation may face additional risks and vulnerabilities
- Frequent moves can disrupt education and relationships
- Living conditions in temporary accommodation may be unsuitable or unsafe
- Families may be experiencing significant stress and financial hardship

If we become aware that a child is living in temporary accommodation, the DSL will consider whether additional support or safeguarding measures are needed.