



Anthem Safeguarding Policy

Children, Young People and Adults at Risk

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1. Policy Statement

Anthem recognises its responsibility for the safety and well-being of children and young people and adults at risk involved in its activities. As a result, we have developed this Safeguarding Policy which establishes a framework to support staff and trustees in their practices and clarifies the charity's expectations for staff, trustees and organisations with whom we work.

2. Commitment of the Anthem team

All staff and trustees will receive a copy of this Safeguarding Policy on taking up their role with us as part of their induction. Training to ensure a full understanding of safeguarding matters and their importance will be provided to staff and trustees; and specific, regular and in-depth training will be provided to the Safeguarding Officer before Anthem starts working directly with young people.

The Safeguarding Lead is: **Rhian Hutchings** Chief Executive Officer – 07966 450299 or email: rhian.hutchings@anthem.wales

The appointed Safeguarding Trustee is: HR & Nominations Committee

Anthem is a developing organisation and this policy will be regularly updated and reviewed annually by our trustees.

3. Why Safeguarding is important

Safeguarding is vitally important to our work as a charity for the following reasons:

- The welfare of children, young people and adults at risk is treated as paramount.
- All children, young people and adults at risk, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity will be protected from abuse.
- Safeguarding is everyone's responsibility. As outlined in the Social Services and Well-being Act (Wales) 2014, if concerns of abuse or neglect are suspected, we have a duty to report these concerns.
- We report any concerns about any crime to the Police.
- All suspicions, incidents of alleged poor practice, misconduct and abuse by employees or volunteers will be taken seriously and must be reported to the relevant Local Authority.
- The board of trustees, employees, contractors, workers, guests and volunteers are clear on how to respond appropriately.
- All children, young people and adults at risk have a right to protection, and the needs of children, young people and vulnerable adults must be taken into account.

Anthem will work directly with children, young people, and adults at risk and will also be making grants to organisations that do. Anthem takes the safeguarding of children and young people seriously and we expect organisations applying for our

funding to have a safeguarding policy and procedures which are up-to-date and relevant to their beneficiaries.

4. Anthem Safeguarding Principles

As part of our safeguarding policy, we will

- promote and prioritise the safety and wellbeing of children and young people, and adults at risk.
- ensure everyone understands their roles and responsibilities in respect of safeguarding.
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

The policy and procedures will be widely promoted and are mandatory for everyone involved in Anthem. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal from the organisation or exclusion from Anthem funding.

All organisations receiving grant funding or applying for grant funding from Anthem have the primary responsibility for safeguarding beneficiaries, staff and volunteers, and must take all the necessary steps to ensure that their organisation is operating in a safe and secure environment. This includes the following actions: staff and volunteers receiving appropriate training and support to prevent safeguarding issues arising, and to spot signs of abuse; carrying out DBS checks where appropriate; robust procedures for reporting abuse in a timely and objective manner; and clear accountability structures, including a named contact for any safeguarding issues.

Anthem will seek to keep children and young people safe by:

- valuing them, listening to and respecting them.
- adopting safeguarding practises through detailed procedures and a code of conduct for staff.
- recruiting staff safely, ensuring all necessary checks are made.
- providing effective management for staff through supervision, support and training developing and implementing an effective e-safety policy and related procedures.
- sharing information about child protection and good practice with children, parents, staff and contractors.
- sharing concerns with agencies who need to know and involving parents and children appropriately.

In particular, Anthem will:

- ensure that all employees, all workshop leaders, chaperones and artists working directly with children, young people, and adults at risk are vetted appropriately and that they read and understand this policy and associated procedures.
- provide guidance and/or training opportunities in terms of safeguarding for all permanent members of staff and, in particular, for those undertaking activities which involve contact with children, young people, or adults at risk.
- make sure that, when working with partner organisations (such as community or youth groups) the responsibilities of each partner in terms of safeguarding are clear and include the responsibilities of chaperoning and risk assessment.
- communicate the relevant contents of the policy to children, young people and adults at risk as appropriate and inform them who the appropriate person or people are to speak to if they have any questions, problems or concerns.
- establish and maintain an ethos where children feel welcome and familiar with their environment and are informed of personal (toilets, dressing rooms etc) and emergency arrangements (fire exits, meeting points etc) and any Health and Safety procedures (dangerous equipment, first aid etc).
- ensure that a register (or signing in/signing out sheet) of every young person taking part in projects is available and a contact name and number close to hand in case of emergencies, wherever possible.
- ensure that parental/guardian consent is gained before photographs or video recordings are taken of children or young people, and that the use to which these images will be put is clearly understood.
- ensure the safety and wellbeing of children, young people and adults at risk is paramount when adults, young people or children are using the internet, social media or mobile devices.
- developing an online safety agreement for use with young people and their parents/carers.

Appendix 1 - Definitions

Children: a child is a person under the age of 18 years.

A child at risk: The Social Services and Well-being (Wales) Act 2014 defines a child at risk as a child who:

- Is experiencing or is at risk of abuse, neglect or other kinds of harm;
- Has needs for care and support (whether or not the authority is meeting

any of those needs).

Adults at risk: As Anthem's remit extends to the age of 25 some of our grant recipients may also work with young people over 18, some of whom may be 'adults at risk'. An adult at risk of abuse or neglect is defined by the Social Services and Well-being (Wales) Act 2014 as someone who is experiencing or at risk of abuse and has needs for care and support which mean they are unable to protect themselves against the abuse or neglect or the risk of it.

We have a wider definition of whom we consider to be adults at risk. This includes people encountering domestic abuse, sexual exploitation and/or human trafficking, people who are experiencing homelessness, people experiencing addiction problems, and people who are refugees or asylum seekers. It also includes people who experience trauma, who have mental health needs, or who have a health condition. We recognise that everyone can face challenges through their life and may become at risk.

Safeguarding: Safeguarding is about embedding practises throughout the organisation to ensure the protection of children, young people and adults at risk wherever possible; and dealing sensitively and appropriately with the situation should any incident arise which places a child or young person at risk, or in which a child, young person or adult at risk has suffered abuse.

Abuse: Definitions of Child Abuse and Neglect - All Wales Child Protection Procedures 2019

A child is abused or neglected when somebody inflicts harm or fails to act to prevent harm. Children may be abused in a family, in an institutional or community setting or online, by those known to them or, more rarely, by a stranger. A child or young person up to the age of 18 years can suffer abuse or neglect and require protection via an inter-agency child protection plan.

Harm

Harm is defined as:

- ill treatment this includes sexual abuse, neglect, emotional abuse and psychological abuse.
- the impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill treatment).
- the impairment of physical intellectual, emotional, social or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment).

Types of Harm (non-exhaustive)

- **physical abuse** - hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions.
- **emotional/psychological** abuse - threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from

services or supportive networks, witnessing abuse of others.

- **sexual abuse** - forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening, including: physical contact, including penetrative or non-penetrative acts; non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways.
- **financial abuse** - this category will be less prevalent for a child but indicators could be: not meeting their needs for care and support which are provided through direct payments; or complaints that personal property is missing.
- **neglect** - failure to meet basic physical, emotional or psychological needs which is likely to result in impairment of health or development.

It is important to note the bullying is also a form of abuse as it is an act of aggressive behaviour in order to intentionally hurt another person or persons, mentally, physically and/or sexually.

Below are examples of types of abuse which will be covered by one of the four categories above but are listed here for information:

- Child Criminal Exploitation (County Lines)
- Child Sexual Exploitation
- Harmful Sexual Behaviour
- Domestic Abuse
- Bullying and Cyber Bullying
- Child Trafficking
- Female Genital Mutilation
- Honour Based Violence (see links section)
- Forced Marriage (see links appendix)

Definitions of Adult Abuse and Neglect

The Wales (Social Services and Well Being Act 2014) defines categories of adult abuse and harm as follows:

- **Physical:** hitting, slapping, over or misuse of medication, undue restraint, or inappropriate sanctions.
- **Sexual:** rape and sexual assault or sexual acts to which the vulnerable adult has not or could not consent and/or was pressured into consenting.
- **Psychological:** threats of harm or abandonment, coercive control, humiliation, verbal or racial abuse, isolation or withdrawal from services or supportive networks (coercive control is an act or pattern of acts of assault, threats, humiliation, intimidation, or other abuse that is used to harm, punish, or frighten the victim).
- **Neglect:** failure to access medical care or services, negligence in the face of risk taking, failure to give prescribed medication, failure to assist in personal hygiene or the provision of food, shelter, clothing; emotional neglect.
- **Financial:** including theft, fraud, internet scamming, coercion in relation to an

adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits

There are additional definitions which, whilst not included in the act are also relevant:

- **Self-neglect:** this covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- **Modern Slavery / Human Trafficking:** encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Domestic Abuse and coercive control:** including psychological, physical, sexual, financial, and emotional abuse. It also includes so-called 'honour' based violence (see links below for information). It can occur between any family members.
- **Discriminatory:** discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender, or disability or any of the protected characteristics of the Equality Act.

Honour-based violence

<https://gov.wales/live-fear-free/honour-based-violence-and-forced-marriage>

Online abuse learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse

Appendix 2 - Reporting Concerns

Anthem keeps a log of any safeguarding concerns and actions taken. If you want to report a concern, you can do that via our Safeguarding Reporting Form.

<https://airtable.com/app8rXVKc4z5GPn2q/pagHBUg1p0h2Q4edV/form>

When to report a concern

- If an employee, contractor, worker, guest or volunteer becomes aware of a potential problem affecting the health, safety or general well-being of a child, young person or adult at risk, while they are involved in activity generated directly by Anthem, they should log the concern and bring it to the attention of the Safeguarding Lead.
- If the issue occurs within the context or work generated by a partner organisation working with Anthem, Anthem employees or contractors should log the concern and raise it with the Safeguarding Lead of the respective organisation.

- If an employee, contractor, worker, guest or volunteer are party to an allegation or suspicion of abuse of children, young people or adults at risk participating in Anthem projects, either within or outside of the work environment, they should log their concern and raise the matter confidentially and immediately with the Safeguarding Lead.

It is important to remember allegations are not always verbal and working with music can often unlock and provide other platforms for ways to express deep emotions.

How to report a concern

1. **Notice** - You notice something worrying? For example, harm, neglect, discrimination, exploitation or unsafe behaviour involving a child or adult at risk. Remain calm and stay in control
2. **Assess** - is there immediate risk? ***If a Child or Adult is in immediate danger call the Police on 999.*** If not, continue.
3. **Record** - When you record a concern, be factual and clear. Use straightforward language and be concise. Do not make any assumptions or include any opinions. Anthem's Safeguarding Concerns Form:
<https://airtable.com/app8rXVKc4z5GPn2q/pagHBUg1p0h2Q4edV/form>
4. **Report** - contact the Designated Safeguarding Lead to let them know what has happened - **Rhian Hutchings** – 07966 450299 or email:
rhian.hutchings@anthem.wales

The Designated Safeguarding Lead or Deputy Safeguarding Lead will assess the report to decide on the next steps. This may include seeking advice from Cardiff Council Safeguarding Team or making a formal referral to an appropriate external authority, eg social care or police.

What to do if a concern is raised

Employees, contractors, workers, guests or volunteers must follow the guidance below if an allegation is made to them. They must:

- Remain calm and in control and not panic.
- Listen carefully to what is being said – they need to remember as much as

possible.

- Not give their own views or opinions – they must remain silent if possible, but nod or give reassuring sounds to show they are listening and understand what is being said.
- Only ask questions to clarify what is being said if needed e.g. if something was said quietly or if they didn't understand a word used.
- Let the individual lead and disclose as much as they want to – they must not try to put words in the young person/adult at risk's mouth or encourage them to talk, as this may affect professional investigations and convictions at a later date.
- Not promise to keep a secret – they should let the young person know they can trust them but that they may need to pass the information onto the Safeguarding Lead to help protect the young person.
- Not call another person over if they are in a one-to-one situation but shouldn't put themselves at risk of an allegation if they are in a private place. They should ensure that the door of the room is open, and that other people can see them in their sight line.
- Reassure the person that they have done the right thing, eg "I am glad you have told me".
- Not show signs of shock through facial expressions or actions, even if the subject matter is shocking or upsetting.
- Make notes straight after their meeting, and write them up as soon as possible using the Anthem Safeguarding Concerns Form
- Remember that it is not their job to prove if this information is true or not. They must pass their concerns onto the Safeguarding Lead who will manage the situation appropriately. If they are unable to contact the Safeguarding Lead or the situation seems urgent e.g. the abuser named is picking the young person up, they should contact the Chair of Anthem, the local Multi-Agency Safeguarding Hub or the Police.

You will be recording your concern on behalf of Anthem and the records we keep are owned by Anthem. You will be named as the person who has logged the concern as a professional working with Anthem. The person who the record relates to is entitled to see the record under GDPR. Please be mindful that your record could be used as evidence in a child protection case and might be handed to a social worker or the police.

The NSPCC helping is also available 24 Hours a day on 0800 800 5000 and further information can be found at

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/what-if-suspect-abuse/>

Appendix 3 - Legislation and guidance

The key legislative framework for safeguarding matters relevant to those who work with Anthem is contained in:

Children Act 1989
United Convention of the Rights of the Child 1991
General Data Protection Regulation 2018
Human Rights Act 1998
Sexual Offences Act 2003
Children Act 2004 (and the All Wales Child Protection Procedures)
The Safeguarding of Vulnerable Groups Act 2006
All Wales Child Protection Procedures Review Group 2008
Rights of Children and Young persons (Wales) Measures 2011
The Protection of Freedoms Act 2012
The Children and Families Act 2014
Special Educational Needs and disability (SEND) Code of Practice: HM Government 2014
Social Services and Well-being (Wales) Act 2014 (Part 7 Safeguarding)
The Children (Performances and Activities (Wales) Regulations 2015
Keeping Young Performers Safe Guidance to accompany the 2015 Child Performance Regulations
Well-being of Future Generations (Wales) Act 2015

Underpinning Wales's approach to child protection is the importance placed on children's rights. The Rights of Children and Young Persons (Wales) Measure 2011 made Wales the first country in the UK to incorporate the United Nations Convention on the Rights of the Child (UNCRC) into its domestic law. This means that all Welsh policy and legislation has to take into account children's rights. The Convention defines a child as any human being under the age of eighteen.

In 2015 the Welsh Government published its Programme for Children and Young People. The programme has 7 core aims, each linked to articles in the United Nations Convention on the Rights of the Child (UNCRC). The programme says children and young people should:

- Have a flying start in life.
- Have a comprehensive range of education and learning opportunities.
- Enjoy the best possible health and freedom from abuse, victimisation and exploitation.
- Have access to play, leisure, sporting and cultural activities.
- Be listened to, treated with respect and have their race and cultural identity recognised.
- Have a safe home and community, which supports physical and emotional well-being.
- Not be disadvantaged by poverty.

The Wales Safeguarding Procedures 2019 provide a common set of safeguarding procedures for every safeguarding board in Wales. They are available at <https://safeguarding.wales/>

They also include full details for all the Safeguarding Boards.

Appendix 4 - Safer recruitment and Disclosure and Barring Service (DBS) checks

- It is important to note that safer recruitment is not confined to conducting DBS checks but includes a responsible and considered approach to recruitment generally including conducting interviews, checks on qualifications and taking up appropriate references.
- We will carry out DBS checks on our trustees and staff as appropriate and recommended and in accordance with the Charity Commission's guidance on safeguarding.
- We will ensure that our funding agreement with each of our grant recipients contains appropriate safeguarding provisions which require them to comply with their own safeguarding duties and conduct all relevant DBS checks.

At the local level, where applicable, Anthem will work with the regional safeguarding children boards, including any Local Authority, Chief Officer of Police, Local Health Board, NHS Trust and provider of probation services that falls within the safeguarding board area. These boards are responsible for the local child protection policy, procedure and guidance.

In the Wales, the regional boards are:

- Cardiff and Vale of Glamorgan safeguarding board – www.cardiffandvalersb.co.uk
- Cwm Taf Morgannwg safeguarding board – www.cwmtafsafeguarding.org
- Gwent safeguarding board – www.gwentsafeguarding.org.uk
- Western Bay safeguarding board – www.wbsb.co.uk
- Mid and West Wales safeguarding board – www.cysur.wales
- North Wales safeguarding board – www.northwalessafeguardingboard.wales

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Approved by Anthem Board – 27 March 2020

Reviewed by Anthem Board - 29th April 2026

Next Review due - April 2027

Signed by Rhian Hutchings, Chief Executive Officer

