



SAFEGUARDING & CHILD PROTECTION POLICY

Policy owner	Designated Safeguarding Lead
Approved by	Senior Leadership Team
Adopted	July 2026
Review date	July 2027, or sooner if guidance changes
Applies to	All staff, governors/councilors, volunteers, contractors, visitors and students

Version control: This policy is based on the Department for Education's information-only KCSIE 2026 publication available in July 2026. The final KCSIE 2026 version is due on 1 September 2026 and must be checked before formal adoption.

Key safeguarding contacts

Role / service	Contact
Designated Safeguarding Lead (DSL)	Emma Finch 01622 756644 efinch@mepatraining.com
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Deputy DSL	Jemma Capon 01622 756644 JCapon@mepaacademy.com
Deputy DSL	Andrea Wroe 01622 756644 Awroe@mepaacademy.com
Principal	Mandy Ellen 01622 756644 Mellen@mepatraining.com
Designated Mental Health Lead	Lewis Muir 01622 756644 lmuir@mepatraining.com
Local Authority Designated Officer (LADO)	Kent Duty LADO 03000 410888 kentchildrenslado@kent.gov.uk
Kent Children's Social Care	03000 411111 Out of hours: 03000 419191 social.services@kent.gov.uk Professionals: Kent Integrated Children's Portal
Kent Safeguarding Children Multi-Agency Partnership	kscmp@kent.gov.uk
Prevent / Channel	Refer through the DSL; where urgent contact Kent Police
Immediate danger	Call 999

Immediate action: If a child is in immediate danger or at risk of immediate harm, call 999 and/or Kent Children's Social Care. Do not wait for the DSL.

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1. Purpose and principles

MEPA Training is committed to safeguarding and promoting the welfare of every child. Safeguarding is everyone's responsibility. All decisions and actions under this policy will be child-centred, timely and based on the child's best interests.

Safeguarding and promoting welfare includes providing help and support as soon as problems emerge; protecting children from maltreatment at home, in the community and online; preventing impairment of mental and physical health or development; ensuring safe and effective care; and taking action to secure the best outcomes.

- Children will be listened to, taken seriously and supported to express their wishes and feelings.
- Staff will maintain an attitude of 'it could happen here' and exercise professional curiosity.
- Abuse, neglect, exploitation and safeguarding issues rarely occur in isolation; risks will be considered together.
- No concern is too small to report. Patterns of low-level information can reveal significant harm.
- Safeguarding action will not be delayed because information is incomplete or the DSL is unavailable.
- Discriminatory attitudes, victim-blaming and language that minimises harm are unacceptable.

2. Scope

This policy applies across MEPA Studios, MEPA Academy and MEPA College to all employees, agency and casual staff, trainee teachers, governors or councilors, volunteers, contractors, visiting professionals, visitors and adults using the premises. It applies to safeguarding concerns arising on site, off site, during online or remote activity, on educational visits, at performances and competitions, in transport or accommodation, and outside organisational hours where there is a connection to MEPA Training.

For this policy, a child is anyone under 18. MEPA may also apply its safeguarding procedures to students continuing in education or training beyond their eighteenth birthday where vulnerability or circumstances make this appropriate, alongside adult safeguarding arrangements.

3. Legal and statutory framework

This policy has regard to the following legislation and guidance, as amended or replaced:

- Keeping Children Safe in Education 2026 (KCSIE), effective 1 September 2026;
- Working Together to Safeguard Children and local Kent safeguarding partnership arrangements;
- Education Act 2002, sections 157 and 175, as applicable;
- Education (Independent School Standards) Regulations 2014;
- Children Acts 1989 and 2004 and Children and Social Work Act 2017;
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012;
- Crime and Policing Act 2026, including changes affecting regulated activity;
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025;
- Equality Act 2010 and Human Rights Act 1998;
- Counter-Terrorism and Security Act 2015 and Prevent duty guidance;
- Female Genital Mutilation Act 2003 and mandatory reporting duties;
- Domestic Abuse Act 2021, Sexual Offences Act 2003 and Modern Slavery Act 2015;
- School Premises (England) Regulations 2012 and current guidance on reasonable force, searching, screening and confiscation, where applicable;

- Statutory Relationships, Sex and Health Education guidance and the EYFS statutory framework where applicable.

4. Definitions

Abuse	Maltreatment of a child by inflicting harm or failing to prevent harm. It may be physical, emotional or sexual and may occur in person or online.
Neglect	Persistent failure to meet a child's basic physical or psychological needs, likely to seriously impair health or development.
Exploitation	Using a child for another person's advantage, gratification or profit, including criminal, sexual, financial or labour exploitation.
Child-on-child abuse	Abuse, harassment or violence by one child against another, online or offline, including harmful sexual behaviour.
Family Help	Co-ordinated support before or alongside statutory intervention, including targeted early help and section 17 support.
Nudes and semi-nudes	Nude or semi-nude visual content made, sent or posted by or involving a person under 18, including altered or AI-generated content, deepfakes and deep nudes.
Low-level concern	A concern about an adult's conduct that is inconsistent with the staff code of conduct but does not meet the harm threshold.
Safeguarding partners	The local authority, integrated care board and chief officer of police responsible for local safeguarding arrangements.

5. Roles and responsibilities

5.1 All adults

Every adult must:

- read Part one of KCSIE 2026 in full, whether or not they work directly with children;
- know the identity and contact arrangements of the DSL and deputies;
- complete safeguarding, child protection and online-safety induction and updates;
- recognise indicators of abuse, neglect, exploitation and extra-familial harm;
- respond appropriately to disclosures, record facts promptly and report without delay;
- never promise confidentiality or investigate a concern themselves;
- make a direct referral to children's social care or police if necessary, particularly where the child is in immediate danger;
- report concerns about adults, including low-level concerns, under section 20;
- challenge inappropriate behaviour and never dismiss harmful conduct as banter;
- support social care and other agencies following a referral.

5.2 Designated Safeguarding Lead

The DSL has lead responsibility for safeguarding and child protection, including online safety, filtering and monitoring. The role carries the status and authority to commit resources, support and direct staff, make referrals and work with external agencies. Ultimate lead responsibility remains with the DSL and is not delegated.

- manage referrals to children's social care, police, Channel, Disclosure and Barring Service and other bodies as appropriate;

- provide advice and support to staff and maintain oversight of safeguarding records and plans;
- ensure the child's wishes and feelings are understood and considered;
- liaise with the Principal, LADO, mental health lead, SEND staff, attendance staff, IT and external agencies;
- ensure child protection files transfer securely and separately from the main pupil file;
- maintain robust cover, including a secure confidential route for concerns when the DSL is absent;
- review policy, practice, training, local thresholds and safeguarding trends;
- lead the organisation's contribution to multi-agency working and assessments.

5.3 Principal and governing oversight

- Ensure this policy and associated procedures are effective, reviewed at least annually and available publicly.
- Appoint a suitably senior DSL and trained deputies and provide sufficient time, funding, training and authority.
- Ensure appropriate safer-recruitment, single central record and allegation-management arrangements.
- Understand filtering and monitoring arrangements and receive assurance on annual effectiveness reviews.
- Ensure children are taught how to keep themselves safe, including online, through an age-appropriate curriculum.
- Review safeguarding data and culture while respecting case confidentiality.

6. Training and awareness

- All new adults receive safeguarding and child protection induction, including online safety, filtering and monitoring, conduct, whistleblowing, allegations, low-level concerns and the absence-from-education response.
- All staff receive updates as required and at least annually. Formal training is refreshed in line with local and statutory expectations.
- The DSL and deputies complete role-specific training at least every two years, Prevent awareness training and knowledge refreshers at least annually.
- Specialist training is provided where roles require it, including safer recruitment, attendance, SEND, harmful sexual behaviour, FGM, exploitation, first aid and reasonable force.
- Understanding is checked through discussion, scenarios, supervision, audit and safeguarding communications; attendance alone is not treated as evidence of competence.

7. Recognising safeguarding concerns

Staff must consider the child's presentation, communication, development, family circumstances, attendance, peer relationships, online life and wider context. Indicators may include:

- unexplained injuries, hunger, poor hygiene, inappropriate clothing or unmet medical needs;
- changes in behaviour, mood, relationships, attendance, engagement, attainment or appearance;
- fearfulness, withdrawal, aggression, sexualised behaviour, self-harm or substance misuse;
- unexplained money, gifts, travel, devices or associations with older individuals or organised groups;

- frequent absence, missing episodes, repeated removal from class, suspensions, part-time timetables or risk of exclusion;
- signs of coercion, control, stalking, intimate-partner abuse, criminalisation or exploitation;
- harmful online contact, pornography, misogyny, misandry, racism, extremist content, scams or financial exploitation;
- a child appearing reluctant or unable to speak, changing an account, using indirect language or not recognising experiences as harmful.

Professional curiosity: A child may not feel ready or know how to disclose. This must not prevent staff from recording observations, asking safe open questions and speaking to the DSL.

8. Responding to concerns and disclosures

8.1 If a child speaks to you

1. Listen calmly and give the child your full attention.
2. Reassure them that they have done the right thing, are being taken seriously and are not to blame.
3. Do not promise secrecy. Explain that information will be shared only with people who need to help.
4. Use open prompts such as 'Tell me what happened'. Do not ask leading questions, investigate or confront anyone.
5. Check whether the child is in immediate danger or needs urgent medical help.
6. Report immediately to the DSL or deputy. If unavailable, or delay would create risk, contact children's social care and/or police directly.
7. Make a factual, dated and timed record as soon as possible, using the child's own words where relevant. Sign or identify the author.
8. Continue to provide appropriate support and follow the DSL's safeguarding instructions.

8.2 Recording

- Record facts, observations, context and actions; distinguish fact from opinion.
- Do not take photographs of injuries on a personal device.
- Record who was informed, decisions made, reasons, referrals made or not made, and the outcome.
- Use CPOMS or Gordian as directed. Urgent concerns must be reported verbally first; an electronic entry is not enough by itself.
- Preserve original notes and relevant evidence securely.

9. Family Help and referrals

Staff should identify children who may benefit from support as soon as problems emerge. Support may be provided through universal services and community-based Early Help, targeted early help within Family Help, or statutory services under section 17 or section 47 of the Children Act 1989.

- The DSL will apply Kent's current threshold and assessment arrangements and consider the cumulative picture.
- A Family Help assessment should be co-ordinated where needs require multi-agency support. Staff may contribute to, or where appropriate lead, an assessment.
- Targeted early help is generally voluntary and requires family consent; consent is not required to make a child-protection referral where there is risk of significant harm.

- If support does not improve the child's situation or risk increases, the DSL will escalate or refer to children's social care.
- Any adult may refer directly. If a referral is not accepted and concerns remain, the DSL will use local escalation procedures.

10. Record keeping, confidentiality and information sharing

Safeguarding information is confidential but not secret. Data protection law permits necessary and proportionate sharing to safeguard children. Fears about sharing information must not obstruct protection.

- Consider the purpose, urgency, risk of sharing or not sharing, necessity, proportionality, accuracy, recipients and security.
- Seek consent where appropriate, but do not seek or rely on consent where this may increase risk, prejudice an investigation or delay protection.
- Tell the child and family what will be shared where it is safe and appropriate to do so.
- Share only through approved secure channels and verify the recipient.
- Keep detailed, accurate and secure records of concerns, discussions, decisions and rationale, including referrals made or not made.
- Retain safeguarding files separately and transfer them securely to the next setting as soon as possible, ordinarily within five days for an in-year transfer or within the first five days of a new term.

11. Child-on-child abuse, harassment and violence

Child-on-child abuse is preventable and may occur inside or outside the setting and online. It is a safeguarding issue for the victim and the child alleged to have caused harm. It includes:

- bullying, cyberbullying, prejudice-based and discriminatory bullying;
- physical abuse, assault, initiation or hazing, threats and weapon-related harm;
- abuse in intimate personal relationships, including coercive control and stalking;
- sexual harassment, sexual violence and harmful sexual behaviour;
- causing someone to engage in sexual activity without consent;
- upskirting and other image-based abuse;
- consensual or non-consensual making or sharing of nudes and semi-nudes;
- abusive, harassing, misogynistic, misandrist or discriminatory online messages.

Reports will be taken seriously. Staff must not use language such as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. MEPA will consider immediate safety, the wishes of the child, ages and development, power imbalance, coercion, patterns of behaviour, SEND, wider peer culture and risk to other children.

- Support and risk assessment will be provided for the victim, alleged perpetrator and other affected children.
- The DSL will consider referral to children's social care and police, specialist harmful-sexual-behaviour advice and Family Help.
- Disciplinary action may run alongside safeguarding and criminal processes but will not replace them.
- The organisation will respond to the wider context, including locations, groups, online spaces and attitudes that enable harm.

12. Sexual violence, harmful sexual behaviour and nudes

Sexual behaviour exists on a continuum from developmentally expected behaviour through problematic and harmful sexual behaviour to sexual violence. The DSL will consider the behaviour, context, consent, coercion, ages, development, frequency, power and impact rather than relying on labels.

Zero tolerance: Sexual harassment and sexual violence are never acceptable and will not be tolerated. A child will never be made to feel ashamed or responsible for reporting.

12.1 Nudes and semi-nudes

- Every incident requires a safeguarding response, whether apparently consensual or non-consensual.
- Staff must not view, copy, print, forward, store or ask a child to send imagery. Devices should not routinely be confiscated without DSL advice.
- The DSL will follow current UKCIS guidance and consider police or children's social care involvement.
- AI-generated, altered or deepfake imagery involving a child is treated as a safeguarding concern in the same way as other imagery.
- The child's immediate safety, blackmail or coercion, distribution, age, vulnerability and risk of further sharing will be assessed.

13. Online safety, generative AI and mobile phones

Online safety is embedded across safeguarding, curriculum, behaviour, staff conduct and technical controls. Risk is considered through the 4Cs:

Content	Exposure to illegal, inappropriate or harmful material.
Contact	Harmful interaction with adults or other children, including grooming.
Conduct	A child's own behaviour online, including bullying, sharing images and unsafe use.
Commerce	Gambling, scams, financial exploitation, advertising and data-related risks.

13.1 Filtering and monitoring

- Appropriate filtering and monitoring will protect users without unreasonably blocking legitimate learning or safeguarding support.
- Roles for the governing body, senior leadership, DSL and IT support will be explicit and understood.
- The responsible senior leader, supported by the DSL and IT, will review effectiveness at least once each academic year.
- The review will test all internet-connected devices in all relevant locations and record checks, findings, risks and actions.
- Alerts will be triaged promptly and safeguarding incidents referred to the DSL.

13.2 Generative AI

- Only approved systems may be used for organisational work involving children or personal data.
- Staff and students must not upload confidential, safeguarding or identifiable information into unapproved AI systems.

- Teaching will address hallucinations, bias, grooming, manipulation, privacy, impersonation, deepfakes and AI-generated sexual imagery.
- AI output must not replace professional safeguarding judgement or direct assessment of risk.

13.3 Mobile phones and communications

MEPA Academy will be mobile phone-free by default throughout the school day, including lessons, movement, breaks and lunch, subject only to authorised educational, medical, disability or safeguarding exceptions. College and Studio arrangements will be age- and setting-appropriate and set out in acceptable-use rules.

- Staff use approved work accounts and devices for communication with children.
- Personal messaging, social-media contact or sharing personal telephone numbers is prohibited unless an authorised emergency arrangement applies.
- Images of children are taken, stored and published only on approved equipment and with appropriate consent and safeguarding controls.

14. Attendance and children absent from education

Repeated or prolonged absence, missing episodes and unexplained changes in attendance may indicate abuse, neglect, exploitation, mental-health difficulty, criminal activity, forced marriage, FGM or other harm.

- Attendance and safeguarding information will be considered together and shared promptly with the DSL.
- First-day and follow-up procedures will be applied consistently, with escalation where contact cannot be made or explanations are unsatisfactory.
- Children on child-protection plans, in care, with SEND, on part-time timetables or in alternative provision receive enhanced oversight.
- MEPA will make required local-authority notifications for admissions, deletions and children missing education.
- Elective home education enquiries will consider whether the decision may conceal safeguarding risk and will be discussed with the local authority where appropriate.

15. Children who may be at greater risk

Any child can be harmed. Some children face additional barriers to recognition, disclosure or support. Staff will avoid assumptions and adapt communication and protection for children who:

- have SEND, disabilities, health conditions or communication needs;
- are young carers, pregnant or parents themselves;
- are looked after, previously looked after, adopted or privately fostered;
- are lesbian, gay or bisexual, or are questioning their gender;
- experience racism, discrimination, poverty, homelessness, migration or insecure status;
- have a parent in custody or are affected by parental offending, domestic abuse, substance misuse or mental ill health;
- are frequently absent, excluded, on part-time timetables or in alternative provision;
- are at risk of exploitation, trafficking, modern slavery, radicalisation, FGM or forced marriage.

For children with SEND, barriers may include communication difficulty, isolation, disproportionate bullying, assumptions that behaviour relates only to a condition and difficulty accessing support. These barriers must increase, not reduce, professional curiosity.

Decisions affecting LGB or gender-questioning children will be child-centred, case-specific and consistent with safeguarding, equality, human-rights and premises duties. Where legal obligations

are unclear, appropriate advice will be obtained. Alternative arrangements should protect the safety, comfort, privacy and dignity of every child without compromising required single-sex provision.

16. Mental health and serious violence

16.1 Mental health

Mental-health concerns can be a cause or indicator of safeguarding harm. Staff should respond to changes in behaviour, attendance, engagement, presentation, relationships or attainment with professional curiosity. Only appropriately trained professionals diagnose or treat mental-health conditions; staff identify, support and refer.

- Immediate risk of suicide or serious self-harm requires emergency action.
- Where mental health is also a safeguarding concern, the DSL must be informed without delay.
- Support will consider adversity, trauma, abuse, discrimination, SEND and family circumstances.

16.2 Serious violence and exploitation

- Indicators include repeated absence, exclusions, injuries, self-harm, declining performance, unexplained gifts, new associations, coercion, weapon-related threats and organised-group involvement.
- Children exploited through gangs or organised networks may identify with the group or be criminalised for conduct undertaken under coercion.
- Criminal and sexual exploitation may constitute modern slavery; the DSL will consider children's social care, police and National Referral Mechanism expectations.
- Immediate danger or weapon-related risk must be referred to police without delay.

17. Preventing radicalisation

MEPA will identify and support children susceptible to radicalisation while respecting lawful expression and avoiding discriminatory assumptions. Concerns are safeguarding concerns and should be reported to the DSL.

- The DSL will assess risk, consult Prevent partners and refer to Channel where appropriate.
- Emergency or terrorism-related information will be reported to police.
- The curriculum will build critical thinking, digital literacy and resilience to extremist narratives, misinformation, disinformation and conspiracy theories.

18. Female genital mutilation and forced marriage

18.1 Female genital mutilation

FGM is child abuse and illegal. A teacher who discovers that FGM appears to have been carried out on a girl under 18 has a personal statutory duty to report this directly to police. The teacher must also inform the DSL. Suspicions or risk indicators are reported to the DSL and children's social care under normal safeguarding procedures.

18.2 Forced marriage and honour-based abuse

Forced marriage is abuse and differs from arranged marriage because consent is absent or coerced. Staff must not approach family members or mediate. Concerns are reported immediately to the DSL, who will seek specialist and statutory advice. Where danger is immediate, contact police.

19. Safer recruitment and regulated activity

- At least one recruitment-panel member will have completed safer-recruitment training.

- Recruitment will include an accurate role description, safeguarding statement, application scrutiny, identity and right-to-work checks, employment history and gap exploration, references obtained directly, qualification checks and appropriate online searches for shortlisted candidates.
- The correct enhanced DBS and barred-list checks, prohibition checks and any overseas checks will be completed before appointment or managed through a documented KCSIE-compliant risk assessment.
- The single central record will be accurate, current and quality-assured.
- Volunteers, contractors, self-employed people, trainee teachers, agency staff, visitors, governors and people in host-family arrangements will receive the checks and supervision required for their role.
- The former supervision exemption must not be relied upon once the relevant Crime and Policing Act 2026 provisions commence. Current regulated-activity definitions and KCSIE must be checked before determining DBS and barred-list requirements.
- Ongoing suitability is monitored and relevant conduct referred to the DBS and/or Teaching Regulation Agency where legal thresholds are met.

20. Allegations and concerns about adults

20.1 Harm threshold

A concern may meet the harm threshold where an adult has behaved in a way that has harmed or may have harmed a child; possibly committed a criminal offence against or related to a child; behaved towards a child in a way indicating they may pose a risk; or behaved in a way indicating they may not be suitable to work with children.

- Concerns about a staff member, volunteer, trainee teacher or contractor are reported immediately to the Principal.
- Concerns about the Principal are reported to the designated governor/councilor or directly to the LADO.
- The case manager will contact the LADO promptly and before investigation, except for immediate protective action.
- Supply agencies, training providers and contracting organisations will be involved without transferring away MEPA's safeguarding responsibility.
- Suspension is not automatic. Alternatives and the child's safety will be considered.
- Outcomes and referrals will follow KCSIE, employment law and statutory reporting duties.

20.2 Low-level concerns

Low-level concerns are reported to the Principal or nominated lead and recorded confidentially. Examples include over-familiarity, favouritism, inappropriate one-to-one arrangements, use of personal devices or accounts, humiliating conduct or behaviour inconsistent with the staff code.

- Concerns will be reviewed for patterns, wider cultural issues and whether the harm threshold is met.
- The adult may be asked for an account, and proportionate action may include advice, training, management action or disciplinary process.
- The person who raised the concern will be treated fairly and protected from retaliation.

21. Alternative provision, work experience and off-site activity

21.1 Alternative provision

- MEPA retains safeguarding responsibility for every child it places.

- Before placement, obtain written assurance on safer-recruitment checks, safeguarding policy, DSL arrangements, attendance and information sharing.
- Record the full address, timetable, provider contacts and emergency arrangements.
- Maintain regular direct contact with the child and provider, monitor attendance and welfare and review whenever concerns arise.
- Escalate unexplained absence, changed arrangements or concerns without delay.

21.2 Work experience, visits, performances and host families

- Complete proportionate safeguarding risk assessments and confirm supervision, transport, accommodation and emergency arrangements.
- Apply current KCSIE checks for adults supervising work experience and private fostering or homestay requirements.
- Share essential safeguarding and medical information securely with those who need it.
- Provide children with a clear route to seek help away from the main site.

22. Premises, sport and reasonable force

22.1 Premises and sport

Facilities and activities will protect every child's safety, comfort, privacy and dignity and meet applicable premises and equality requirements. Toilets, changing rooms, showers and any residential accommodation will be managed consistently with current law and KCSIE. Requests for alternative arrangements will be considered individually without compromising required single-sex facilities. Sport will be safe and fair and informed by relevant national governing-body guidance. Where a sport is separated by biological sex because strength, stamina or physique creates a safety or competitive disadvantage, decisions will follow applicable Equality Act provisions and safeguarding needs.

22.2 Reasonable force and restrictive intervention

- Force is used only where lawful, necessary and proportionate, and never as punishment.
- Staff consider the child's age, SEND, medical needs, trauma and communication before intervention wherever possible.
- Incidents are recorded, parents informed where appropriate and safeguarding implications reviewed by the DSL.
- Any use suggesting excessive force, pain, humiliation or punitive intent is reported under adult-concern procedures.

22.3 Use of premises by other organisations

Lettings and partnership agreements will include safeguarding expectations and routes for allegations. Where an allegation concerns an incident during use of MEPA premises, the Principal and DSL will ensure it is referred to the appropriate body and LADO where relevant.

23. Whistleblowing and complaints

Adults must be able to raise safeguarding concerns without fear. Where normal reporting routes are inappropriate, ineffective or compromised, concerns should be raised through the whistleblowing procedure, directly with the LADO or children's social care, or through an appropriate external whistleblowing route.

- No person will suffer detriment for raising a genuine safeguarding concern in good faith.
- A complaint process must not delay safeguarding referral or protective action.

- Concerns about organisational culture, unsafe practice or failure to act will be escalated to governance oversight.

24. Quality assurance and policy review

- The policy is reviewed at least annually and whenever legislation, KCSIE, local arrangements or organisational circumstances change.
- The final KCSIE 2026 publication will be checked on or after 1 September 2026 before adoption.
- Safeguarding audits will examine training, records, referrals, attendance, allegations, low-level concerns, alternative provision, online-safety controls and the child's experience.
- Lessons from incidents, complaints, local and national reviews and children's views will inform improvement.
- Contact details and referral routes will be checked at each review and after notification of change.

25. Touching Policy – “Hands On Approach”

We are a caring establishment, who takes the development and nurture of our students very seriously. Therefore, we feel tactile behaviour is acceptable and a necessary requirement of the job.

When a student needs correcting, needs help stretching or needs to be aware of what is acquired of them and their body, this may require a 'hands on approach'. This is always within a class environment and appropriate to the style of teaching

If a member of staff feels a particular gesture may have offended or affected a student in any way, the incident should be reported to Senior Management immediately who will make a record of it. In return if a student feels uncomfortable in any way or feels the teachers 'hands on approach' is inappropriate then they must report to Senior Management. So, the accusations can be dealt with as soon as possible and in the appropriate manner.

MEPA only employs teachers who are DBS checked, insured and have the appropriate qualifications for their chosen field. This policy is reviewed annually

26. Student Support

MEPA Training student support services are available to all students who may be experiencing problems such as difficulties with, performances, coursework, problems settling in, bullying, financial difficulties, health issues, family problems and any forms of abuse.

MEPA Training makes the commitment to offer:

Someone to listen and offer advice and provide relevant information confidentially and refer students to professional counsellors if appropriate. MEPA Training offers a range of useful services for current and prospective students and can assist with a wide variety of issues relating to a student's individual needs and requirements.

This includes:

- Giving impartial course guidance
- Providing financial advice and information about accommodation
- Keeping students informed about travel assistance and other dispensations available
- Liaising with external agencies on behalf of students
- Providing careers advice and guidance

- Providing basic counselling support
- Providing a support for students with additional needs
- Providing extra guidance for students with SEN The Student Support Officer is always willing to listen if any student has a problem.

Other Student Services

- Kooth – MEPA Training has a link with Kooth which offers free, safe, and anonymous online mental wellbeing platform for children and young people, offering counselling, peer support and self-help resources.
- Medical advice and guidance - MEPA Training offer a range of contacts including Sports injury massage therapists, Medical advisors and nutritionists. Please refer to your student handbook or ask at reception.
- Library - MEPA Training library stocks a number of publications related to coursework, journals, dictionaries, readers, novels, newspapers, DVD's, CD's and magazines. The library operates a lending system for some books and audio visual materials. Students are additionally encouraged to join the local public library, which is just minutes walk from the college. Wireless internet access is available for free at the college.
- Travel information - On arrival, students are advised on how to use public transport, how to get concessions on tickets and plan journeys using local routes.
- Books and stationery – We provide students, where applicable, with the relevant course materials. However, students must purchase their own textbooks from the organisation or elsewhere. The textbooks and other course materials form an essential part of class work and must be brought to classes. Students are expected to buy their own textbooks and stationery.
- English language support - Students who wish to enrol on the full-time course whose English requires improvement are encouraged to attend language classes prior while continuing with their studies.
- Part-time employment – We provide an advisory service to students on how to find part-time jobs.
- Student Accommodation - MEPA College has access to local Student accommodation. The accommodation is on a first come first served basis. A student will only be offered accommodation once relevant checks and references have been obtained.

Would you like to arrange a meeting?

The process Firstly, please feel free to talk to any of your teachers or the support staff. Please see below a list of your Designated Safeguarding Leaders:

- Emma Finch (DSL) - efinch@mepatraining.com - Emma oversees the whole of Safeguarding of MEPA Training
- Lewis Muir (DDSL) - lmuir@mepatraining.com - Lewis oversees the whole of Safeguarding of MEPA Training
- Jemma Capon (DDSL) - jcaupon@mepatraining.com - Jemma oversees the BTEC Training Program
- Andrea Wroe (DDSL) - awroe@mepaacademy.com - Andrea oversees the Academy Training Program

If you would like to arrange a meeting and do not feel you can or have had the opportunity to speak with any members of staff, please use the link below and someone will be in contact with you. These forms will be kept confidential and will not be shared with any member of staff.

There will be posters with QR codes linked to this form, so it can be accessed wherever you are in the building.

27. Child-on-Child Abuse Policy and Procedure

MEPA Training recognises that children can abuse other children. This is known as child-on-child abuse and may occur inside or outside the school, during rehearsals, classes, performances, trips and residential activities, and through online or mobile technology.

All child-on-child abuse is unacceptable and will be taken seriously. It will not be dismissed as “banter”, “part of growing up”, “just having a laugh” or an inevitable part of performing arts training. MEPA Academy maintains an attitude of “it could happen here”. The absence of reports will not be taken to mean that abuse is not occurring. Staff must remain alert to signs that a child may be experiencing harm and create an environment in which children feel safe and confident to report concerns.

This section should be read alongside MEPA Academy’s wider safeguarding and child protection policy, behaviour policy, anti-bullying policy, online safety policy, equality and diversity policy, complaints procedure and staff code of conduct.

2. Scope

This policy applies to:

- all children and young people under the age of 18 attending or connected with MEPA Academy;
- all employees, freelance tutors, visiting professionals, volunteers, chaperones, contractors and trustees/directors;
- activity on Academy premises and at external venues;
- rehearsals, performances, auditions, trips, transport, changing arrangements, accommodation and social events; and
- behaviour online or outside Academy activities where it affects the safety or welfare of a child, or the safe operation of the Academy.
- A child who is alleged to have harmed another child will also be treated as a child with safeguarding and support needs.

3. What is child-on-child abuse?

Child-on-child abuse may be a single incident or a pattern of behaviour. It may be carried out by one child or a group and can occur between children of any age, sex, gender identity, sexual orientation, ethnicity, faith, background or ability.

It may include, but is not limited to:

- bullying, including cyberbullying and prejudice-based or discriminatory bullying;
- physical abuse, such as hitting, kicking, biting, shaking or otherwise causing physical harm;
- sexual violence, including rape, assault by penetration and sexual assault;
- sexual harassment, including sexual comments, jokes, taunting, gestures, unwanted attention or sexualised behaviour;
- causing someone to engage in sexual activity without consent;
- consensual or non-consensual sharing of nude or semi-nude images or videos;
- “upskirting” or recording another person in a changing or private space;

- harmful or abusive sexual behaviour;
- online abuse, coercion, threats, impersonation, harassment or exploitation;
- controlling, coercive or abusive behaviour within an intimate relationship between children;
- abuse connected with gangs, exploitation or serious youth violence;
- initiation, hazing or humiliating rituals;
- deliberately excluding, intimidating or targeting another child;
- abuse motivated by a protected characteristic or perceived difference; and
- encouraging, assisting, filming or sharing recordings of abusive behaviour.

Staff must consider differences in age, development, ability, power, popularity, status and vulnerability. Behaviour should not be assumed to be consensual simply because the children are of a similar age or are in a relationship.

4. Prevention

MEPA Academy will seek to prevent child-on-child abuse by:

- maintaining clear standards of respectful and inclusive behaviour;
- teaching and reinforcing appropriate boundaries, consent and safe online conduct;
- providing age-appropriate information about healthy relationships and how to seek help;
- ensuring children know who the DSL and Deputy DSL are and how to report concerns;
- providing more than one way to report, including speaking privately to a trusted adult;
- challenging sexualised, discriminatory, intimidating or harmful language and behaviour;
- supervising higher-risk locations and activities appropriately;
- making safe arrangements for rehearsals, changing spaces, performances, transport, trips and accommodation;
- assessing risks created by mixed ages, one-to-one scenes, physical contact, choreography, costumes and changing requirements;
- training staff to recognise and respond to child-on-child abuse; and
- reviewing incidents and patterns to identify locations, activities, groups or practices requiring additional safeguards.
- Artistic content, performance requirements, direction or choreography must never be used to justify unsafe, sexualised, humiliating or abusive behaviour.

5. How children can report concerns

A child may report a concern to any member of staff, tutor, chaperone or volunteer. Reports may be made verbally, in writing, electronically or through a parent, carer, friend or other trusted person.

Children will be told that:

- their concern will be taken seriously;
- they will not be blamed for what happened;
- they will be supported and kept informed as far as possible;
- information will only be shared with people who need it to help keep children safe; and
- staff cannot promise to keep safeguarding information secret.
- A child will not be required to provide a full or repeated account before action is taken to protect them.

6. Staff response to a disclosure or concern

If a child makes a disclosure, or a member of staff witnesses or suspects child-on-child abuse, the member of staff must:

- Ensure immediate safety. Separate the children where necessary and obtain medical assistance if required. Do not place staff or children at further risk.
- Listen calmly and carefully. Allow the child to speak in their own words and at their own pace.
- Reassure the child that they have done the right thing by reporting and that the behaviour is not their fault.
- Do not promise confidentiality.
- Ask only open and necessary questions to establish what happened and whether anyone is in immediate danger. Do not investigate, challenge the account or ask leading questions.
- Do not confront the child alleged to have caused harm or arrange a meeting between the children.
- Preserve possible evidence. Staff must not view, copy, print, forward or ask a child to send nude or semi-nude imagery. Devices and messages should be preserved and the DSL consulted.
- Make a written record as soon as possible, using the child's own words wherever possible. Record the date, time, location, people present, observed injuries or behaviour, and actions taken. Distinguish facts from professional opinion.
- Report the concern to the DSL immediately using the Academy's safeguarding reporting procedure.
- If the DSL is unavailable, report to the Deputy DSL. If neither is available and a child may be at immediate risk, staff must contact children's social care and/or the police directly and inform the DSL as soon as possible.

If there is an immediate danger or urgent medical need, call 999.

Staff must never attempt to resolve suspected abuse through informal mediation, a forced apology or restorative work before the safeguarding risks have been assessed.

7. DSL assessment and decision-making

On receiving a report, the DSL will make an immediate, child-centred assessment. This will consider:

- the wishes and feelings of the child who may have been harmed;
- the nature, seriousness and frequency of the behaviour;
- whether the conduct may constitute a criminal offence;
- the ages and developmental stages of all children involved;
- differences in power, status, ability or vulnerability;
- whether coercion, intimidation, threats, exploitation or discrimination were involved;
- whether imagery or online material exists or may be circulated;
- risks to siblings, witnesses or other children;
- any previous concerns or patterns of behaviour;
- the need for medical, emotional or specialist support; and
- how the children can continue accessing education or Academy activities safely.

The DSL will not wait for a child to make a formal complaint before taking safeguarding action.

Depending on the circumstances, the DSL may:

- manage the concern internally with a written safeguarding and support plan;
- seek advice or make a referral to local authority children's social care;
- contact the police, particularly where a criminal offence may have occurred;
- refer to specialist services;

- liaise with the children's schools or other relevant settings, where proportionate and necessary;
- follow local procedures for harmful sexual behaviour or sharing nude and semi-nude images; and
- make an immediate referral where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm.

Where both children attend MEPA Academy, the DSL should, where possible, allocate different trusted adults to support them.

8. Informing parents and carers

The DSL will normally inform the parents or carers of the children involved as soon as reasonably possible.

Parents or carers will not be informed before advice is obtained from children's social care or the police where doing so could:

- place a child at greater risk;
- prejudice a police or safeguarding investigation;
- lead to evidence being lost or destroyed; or
- otherwise be contrary to the child's welfare.

Information provided to each family will respect the privacy and rights of the other children involved. Families will not normally be given confidential details about another child.

9. Supporting the child who may have been harmed

Support will be based on the individual child's needs and wishes and may include: an immediate safety and support plan;

- a named trusted adult;
- changes to groups, rehearsals, schedules, entrances, exits, changing arrangements or supervision;
- support to continue participating without being disadvantaged;
- referral to medical, counselling or specialist services;
- support concerning online content or image removal;
- regular welfare check-ins; and
- liaison with parents, carers, schools or external agencies where appropriate.

The child who reports abuse should not automatically be moved, withdrawn or required to change their routine. Any arrangements must prioritise their safety, welfare and preferences while avoiding the impression that they are being punished.

No child will be required to participate in mediation, restorative work or direct contact with the other child. Such an approach will only be considered if judged safe by the DSL, supported by relevant professionals and freely agreed by the child who was harmed.

10. Responding to the child alleged to have caused harm

The Academy will take protective action while treating the allegation fairly and without prejudging its outcome.

The child alleged to have caused harm may also need safeguarding support. Their behaviour may indicate unmet needs, previous exposure to abuse, exploitation or other welfare concerns.

Appropriate support and external referrals will be considered.

A written risk-management plan may include:

- increased supervision;
- changes to timetables, groups or activities;
- restrictions on contact or online communication;
- separate arrival, departure, changing or rehearsal arrangements;
- temporary suspension from particular activities or the Academy where necessary and proportionate; and
- behavioural, therapeutic or specialist intervention.

Protective action and disciplinary action are separate processes. The Academy's behaviour or disciplinary procedure may be used where appropriate, but it will not replace safeguarding referrals or support.

11. Police and external investigations

Where police or children's social care are involved, MEPA Academy will cooperate with their enquiries and seek advice before carrying out any internal investigation that could interfere with an external investigation.

The Academy may still take proportionate steps to protect children while an external investigation is continuing. The fact that a case does not result in a prosecution, conviction or statutory intervention does not prevent the Academy from continuing safeguarding measures or taking action under its own policies, using the appropriate standard of proof for that process.

12. Confidentiality and information sharing

Information will be shared only with those who need it to safeguard and support the children involved. Safeguarding information may be shared without consent where necessary and proportionate to protect a child.

Staff, children and families will be reminded not to discuss allegations publicly or on social media. The Academy cannot promise anonymity, but will take reasonable steps to protect the privacy and dignity of everyone involved.

13. Recording and retention

All reports, decisions, referrals, risk assessments, support plans, communications and reviews must be recorded on the Academy's confidential safeguarding system.

Records must:

- be factual, accurate, dated and timed;
- identify who made each decision and the reasons for it;
- record the child's wishes and feelings;
- record advice received from external agencies; and
- be stored, retained and transferred in accordance with the Academy's safeguarding records procedure and data protection obligations.

Records of different children should be maintained separately, with appropriate cross-references where necessary.

14. Monitoring and review

The DSL will regularly review each case, including the effectiveness of safety measures and the wellbeing of all affected children. Plans will be updated whenever circumstances or risks change.

The DSL will also monitor anonymised patterns and trends, including repeated concerns, locations, activities, online platforms, protected characteristics and groups. Relevant findings will be reported to the Principal so that supervision, training, premises, culture and procedures can be improved.

15. Protection from retaliation

MEPA Academy will not tolerate intimidation, victimisation, retaliation or adverse treatment against a child who reports a concern, supports another child or participates in a safeguarding process. Any such behaviour will be treated as a separate safeguarding and behaviour concern.

Appendix A: Staff response checklist

Do: Listen, reassure, record, report and act. If danger is immediate, contact emergency services or children's social care.

Concern about a child	Report to the DSL/deputy immediately; record facts on the approved system.
Immediate danger	Call 999 and/or Kent Children's Social Care. Then inform the DSL.
Disclosure	Listen; do not promise secrecy; do not investigate; preserve the child's words.
Concern about staff	Report to the Principal. If about the Principal, use the designated governance/LADO route.
Low-level concern	Report under the low-level-concerns procedure; do not dismiss or manage informally.
Nudes/semi-nudes	Do not view, copy or forward. Report to the DSL immediately.
FGM discovered by teacher	Teacher reports directly to police and informs the DSL.
Radicalisation concern	Report to the DSL; urgent threats go to police.

Appendix B: Managing reports of sexual harm

1. Protect immediate safety and provide a calm, private and supportive response.
2. Inform the DSL immediately and make a factual record.
3. Do not view sexual imagery or mediate between children.
4. Complete an initial risk and needs assessment for the victim, alleged perpetrator and others.
5. Consider children's social care, police, specialist HSB support and Family Help.
6. Agree safety arrangements covering contact, classes, travel, online spaces and communication.
7. Keep the victim informed in age-appropriate language and avoid repeated retelling.
8. Review risk, support, peer culture and any disciplinary response; record decisions and rationale.

Appendix C: DSL responsibilities

1. Availability and robust cover for safeguarding concerns.
2. Referrals and liaison with children's social care, police, LADO, Channel, DBS and other agencies.
3. Leadership of Family Help, section 17 and section 47 contributions.
4. Information sharing, secure records and child-protection-file transfer.
5. Support, advice and safeguarding supervision for staff.
6. Online-safety leadership, including filtering and monitoring assurance.
7. Training, policy awareness and maintenance of current local knowledge.
8. Listening to children and ensuring wishes and feelings inform action.
9. Promotion of educational outcomes for children with safeguarding needs.
10. Annual policy review, trend analysis and reporting to governance.

Appendix D: Related policies and sources

Related MEPA policies

1. Staff Code of Conduct and Disciplinary Procedure
2. Safer Recruitment Procedure
3. Whistleblowing Policy
4. Behaviour Policy
5. Attendance and Children Missing Education Procedure
6. Online Safety and Acceptable Use Policy
7. Data Protection and Records Management Policies
8. Relationships, Sex and Health Education Policy
9. Complaints Procedure

Principal statutory and practice sources

- Department for Education, Keeping Children Safe in Education 2026.
- HM Government, Working Together to Safeguard Children.
- Department for Education, What to do if you're worried a child is being abused.
- UK Council for Internet Safety guidance on sharing nudes and semi-nudes.
- Department for Education filtering and monitoring standards and generative-AI safety guidance.
- Kent Safeguarding Children Multi-Agency Partnership procedures and Kent County Council referral routes.