



MEPA TRAINING

SAFEGUARDING & CHILD PROTECTION POLICY

THIS POLICY IS WRITTEN FOR AND APPLIED TO MEPA STUDIOS, MEPA ACADEMY AND MEPA COLLEGE.

Updated & Adopted:	August 2025
Review Date:	August 2026



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IMPORTANT CONTACTS FOR THE MEPA TRAINING

Specific responsibility	Name(s)	Contact details
MEPA Training Designated Senior Lead (DSL) for Child Protection	Emma Finch	efinch@mepatraining.com 01622 756644
MEPA Training Deputy Designated Senior Lead (DDSL) for Child Protection	Lewis Muir	lmuir@mepatraining.com 01622 756644
MEPA Training Deputy Designated Senior Lead (DDSL) for Child Protection	Jemma Capon	JCapon@mepaacademy.com 01622 756644
Designated Senior Mental Health Lead	Lewis Muir	lmuir@mepatraining.com 01622 756644
MEPA Training E-Safety Officer	Lewis Muir	lmuir@mepatraining.com 01622 756644
MEPA Training Designated Teacher for Children Looked After (CLA)	Lewis Muir	lmuir@mepatraining.com 01622 756644
Local Safeguarding Children Board (LSCB / MASH)	Kent Safeguarding Children Multi-agency partnership	kscmp@kent.gov.uk 03000 421126
Prevent/Channel/Radicalisation Referrals	Via DSL Kent Police	Kent Police: channel@kent.pnn.police.uk 01622 777555
Local Authority Designated Officer	KCC Duty LADO	03000 410888 kentchildrenslado@kent.gov.uk
Mandatory Reporting of Female Genital mutilation	N/A	It is the responsibility of the Teaching staff who discover this to report it directly to the police and then advise the DSL
Reporting a child missing from education	Lewis Muir (Attendance Officer)	lmuir@mepatraining.com 01622 756644
Reporting Child Sexual Exploitation	Emma Finch	efinch@mepatraining.com 01622 756644
NSPCC Whistleblowing helpline	N/A	0800 028 0285
<i>If you are concerned about the welfare or safety of a child and do not work in the MEPA Training, you should report your concerns to:</i>	KCC Central Referral Unit	03000 411111 Out of hours: 03000 419191 central.duty@kent.gov.uk

INTRODUCTION

Safeguarding is the action taken to promote the welfare of children and protect them from harm.

Safeguarding means:

- Protecting children from abuse and maltreatment
- Preventing harm to children's health and development
- Ensuring children grow up with the provision of safe and effective care
- Taking action to enable all children and young people to have the best outcomes.

Child protection is part of the safeguarding process. It focuses on protecting individual children suffering from or likely to suffer, significant harm. This includes child protection procedures which detail how to respond to concerns about a child. Safeguarding is the responsibility of everyone. Everyone who comes into contact with children and young people has a role to play.

We believe that our organisations should provide a caring, positive, safe and stimulating environment that promotes rounded development of each child.

This policy applies to all employees, volunteers and visitors, but specifically:

- Permanent staff, both teaching and non-teaching
- Temporary agency workers, contractors and casual workers
- Visitors to the site whether for lettings, events, training or conferences
- MEPA Training central staff
- Central Government, Local Authority and peripatetic staff
- Parents, volunteers and other community visitors.

LEGISLATION AND STATUTORY GUIDANCE

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education 2025
- Education and Training (Welfare of Children) Act 2021
- Working Together to Safeguarding Children 2018
- What to do if you're worried a child is being abused (2015)
- The Teachers' Standards
- The Safeguarding Vulnerable Groups Act 2006
- Section 157 of the Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- Human Rights Act 1998
- Equality Act 2010, including Part 11 on the advancement of equality

We acknowledge that updated DfE guidance on Relationships, Sex and Health Education (RSHE) and supporting gender-questioning children is expected in Autumn 2025. This policy will be updated accordingly upon publication.

MEPA TRAINING Safeguarding Policy should be read alongside key MEPA Training policies/guidance which will interrelate, such as:

MEPA Training policies:

- Disciplinary Procedure and Code of Conduct
- Safer Recruitment Procedure
- Whistleblowing

- ICT Acceptable Use Policy
- Child on Child Abuse Policy

MEPA Training policies/procedures/guidance or curriculum requirements such as:

- Behaviour Management Policy
- Attendance Policy
- ICT Acceptable Use guidance
- Positive Handling Policy (where restraint is used)
- Relationship and Sex Education Curriculum policies

DEFINITIONS

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- 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

The following three safeguarding partners are identified in Keeping Children Safe in Education (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)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

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.

Sharing nude and semi-nude images is the sharing of sexual imagery (photos or videos) by children.

Children includes everyone under the age of 18.

DSL (Designated Safeguarding Lead) refers to the person in the MEPA Training who has lead responsibility for child protection and safeguarding children. All staff, via their child protection training, must be made aware of, and understand the role of the DSL.

Staff refers to all teaching and non-teaching staff, permanent and temporary, who have contact with children. It includes volunteers, student teachers and those on ITT programmes.

A child is defined as everyone under 18. (There are a number of different laws across the UK that specify age limits in different circumstances. These include child protection, age of consent and age of criminal responsibility.) This policy covers those in education and training in the academic year following their 18th birthday and attending an MEPA Training for education, training or work experience.

Age of consent (the legal age for sexual activity) in the UK is 16 years old. Laws are in place to protect children, not to prosecute under-16s who have mutually consenting sexual activity but will be used if there is abuse or exploitation involved. To help protect younger children, the law says anyone under the age of 13 can never legally give consent. This means that anyone engaging in sexual activity with a child who is 12 or younger will be subject to penalties set out under the Sexual Offences Act 2003.

The law also gives extra protection to children who are 16 to 17 years old. It is illegal to:

- Take, show or distribute indecent photographs
- Pay for or arrange sexual services
- For a person in a position of trust (for example, teachers) to engage in sexual activity with anyone under the age of 18.

The age of criminal responsibility for children is 10 years old. Criminal responsibility is based on when a child is considered capable of committing a crime and old enough to stand trial and be convicted of a criminal offence.

Children's wishes - most guidance for Children and Young People's Services (like safeguarding and health care) emphasise how important it is to listen to the wishes of the child. However, authorities have a duty to act in the best interests of the child which may mean contradicting their wishes. Legislation in England asks that due consideration is given to the wishes and feelings of a child as far as reasonable before making decisions on what services to provide or action to take.

Safeguarding also relates to wider aspects of MEPA Training life including:

- Children's health and safety
- The use of reasonable force
- Meeting the needs of children with medical conditions
- Providing first aid
- Educational visits
- Intimate care – appropriate to the age of the child
- Internet or on-line safety
- Appropriate arrangements to ensure school security

EQUALITY STATEMENT

Some children have an increased risk of abuse 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)
- Are young carers

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- 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 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 a child who is previously looked after or adopted

Any child who makes an allegation should be taken seriously, kept safe and never be made to feel they are creating a problem for reporting abuse, sexual violence or sexual harassment.

ROLES AND RESPONSIBILITIES

The responsibility of all adults:

- Have an effective system in place to ask our children what they want from an effective child protection system.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Be aware of the signs of abuse and maintain an attitude of “*It could happen here*” with regards to child protection.
- Ensure that children know that there are adults in the school whom they can approach if they are worried about anything, whether in school, at home, or in general.
- Know what to do if a child tells them they are being abused or neglected.
- Know how and where to record their concerns and report these to the Designated Safeguarding Lead, as soon as possible.
- If a child is in immediate danger, know how to refer the matter to Children’s Social Care and/or the police immediately.
- Support students on a Child Protection Plan and notify the Designated Safeguarding Lead of any child on a Child Protection Plan who has an unexplained absence.
- Actively plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Read and understand *Part 1 of Keeping Children Safe in Education September 2025* and be alert to signs of abuse and know to whom they should report any concerns or suspicions.
- Participate in safeguarding training as part of the induction process.
- Receive safeguarding and child protection updates as required, but at least annually, to provide staff with relevant skills and knowledge to safeguard children.
- Ensure that they know who the Designated and Deputy Safeguarding Lead(s) is/are and how to contact them.
- Be aware of the ‘Early Help’ process and understand their role in it.
- Immediately refer to the DSL or Principal if they have concerns about another member of staff.
- Immediately refer to the LADO where the concerns are about the Principal.

Responsibility of The Designated Safeguarding Lead (DSL)

The designated safeguarding lead takes **lead responsibility** for safeguarding and child protection (including online safety) in the school. The DSL duties include:

- ensuring child protection policies are known, understood and used appropriately by staff
- working with the MEPA Training council to ensure that the Trust's child protection policies are reviewed annually and that the procedures are reviewed regularly
- acting as a source of support, advice and expertise for all staff on child protection and safeguarding matters
- acting as a point of contact with the three safeguarding partners
- making and managing referrals to children's social care, the police, or other agencies
- taking part in strategy discussions and inter-agency meetings
- liaising with the "case manager" and the designated officer(s) at the local authority if allegations are made against staff
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child's new school
- ensuring that all concerns, discussions and decisions made and the reasons for those decisions should be recorded. Information should be kept confidential and stored securely. Records should 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.
- In this MEPA Training, any individual can contact the DSL if they have concerns about a child. Whilst the activities of the DSL can be delegated to appropriately trained deputies the ultimate lead responsibility for child protection remains with the DSL; this lead responsibility should not be delegated. The DSL has responsibility for leading and managing all aspects of safeguarding in the MEPA Training.

[Please see Appendix 2 – Roles and responsibilities of the DSL](#)

STAFF TRAINING

MEPA Training ensures that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction training should be in line with any advice from the safeguarding partners.

In addition, all staff should receive regular safeguarding and child protection updates, including online safety as required, at least annually, to provide them with relevant skills and knowledge to safeguarding children effectively. This includes reading KCSIE 2025 and the MEPA TRAINING safeguarding policy and training on how to use the school's on-line systems for child protection (CPOMS, Gordian) to record concerns and incidents.

All staff and MEPA Training staff are required to complete the Educare modules on Safeguarding and Prevent as a minimum. Other modules may also be undertaken or stipulated by the senior team. Staff with specific roles (such as pastoral staff, DDSLs) should undertake regular safeguarding training which is relevant to their role, such as FGM, CME, CSE.

STAFF/PUPIL RELATIONSHIPS

Staff are aware that inappropriate behaviour towards students is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18. We provide our staff with advice regarding their personal online activity, and we have clear rules regarding electronic communications and online contact with pupils. It is considered a serious disciplinary issue if staff breach these rules. Our [Staff Handbook](#) sets out our expectations of staff and is signed by all staff members.

Additionally, staff should:

- Not spend time alone with children, especially away from others, unless there is a justified need for privacy/confidentiality. Meetings with individual children should take place as openly as possible. If privacy is needed, the door should be left partly open where appropriate and other staff be present or informed of the meeting.
- Understand that physical contact should usually only be made to restrain youngsters in danger of hurting either themselves or someone else. Where Positive Handling (restraint) is used in a school, staff are expected to have been trained and a school-level Positive Handling policy should be in place. Staff should use professional judgement when making physical contact with a distressed child, for example.
- Not take children alone in a car journey, however short. Where this is unavoidable, it should be with the full knowledge and consent of the parents or carers, and someone in charge of the activity. Staff should be able to state the purpose and anticipated length of the route and will have checked insurance liability.
- Not contact or meet with children outside organised activities unless it is with the knowledge and consent of parents and someone in charge of the activity. This only takes place for events, shows, trips and competitions. Parents are required to provide consent for any outside of school hours activities.
- Not give children your personal phone number or contact them/befriend them via social media.

Senior Management staff mobile phones are all work mobile phones and are the only phone numbers that are shared with students. Phone numbers are shared with students and vice versa for the purpose of trips, events, and competitions where the parent of the child is not present.

SOCIAL MEDIA

The use of social media websites is increasingly common and these communication tools have the potential to create a significant impact on organisational and professional reputations. MEPA Training has developed a policy to properly portray, promote and protect the studios and assist in creating and managing their social media accounts.

Senior Management social media profiles are also work profiles for the purpose of adding parents/carers to groups for communication. MEPA Training has a Facebook group for Academy parents, College students and Studio parents and students. These enables easy and quick information to be shared with all. All designated safeguarding leads are members of each Facebook group.

WHO IS RESPONSIBLE FOR OUR SOCIAL MEDIA ACCOUNTS

Mandy Ellen	Principal Senior Management Team
Lewis Muir	Head of Academy

IDENTIFYING CONCERNS AND DEALING WITH A DISCLOSURE FROM A CHILD

All MEPA TRAINING organisations use a cloud-based system for logging, storing and sorting safeguarding concerns actions and additional information. These systems are CPOMS or Gordian and allow DSLs to immediately receive flags and concerns from staff. Staff are encouraged to log even small concerns (ie not full disclosures) on the system as many minor concerns from a range of staff can allow DSLs to build a bigger picture around a child. Such concerns or observations might include:

- Sudden changes in behaviour and attitude
- Withdrawal and lack of interaction with peers
- On-going friendship issues
- Appearing hungry on arrival, repeatedly not having the necessary equipment
- Frequent lateness
- Inappropriate conversations including sexualised language at a young age
- Marks on the skin or bruises that are not explained
- Having large amounts of cash and/or expensive equipment in school

Any conversations, actions or observations that could be part of wider safeguarding jigsaw should be logged, with full information (dates, times, staff involved, etc.) If a member of staff has concerns about a child, but the child has not disclosed an issue, the member of staff could start a conversation with a very open question, such as: *"I've noticed you've been quiet lately. Is everything OK?"* DSLs, together with other key pastoral staff will have access to relevant students on the online system and will check updates daily. DSLs and pastoral staff will also log actions that have been taken around a child causing concern so that staff are made aware. Staff should never feel that information that is passed on 'disappears into a black hole.'

If a child chooses to tell a member of staff directly about alleged abuse (makes a disclosure), there are a number of actions that the staff member must undertake to support the child:

- The key facts should be established in language that the child understands and the child's words will be used in clarifying/expanding what has been said.
- Listen to what is being said without displaying shock or disbelief.
- Reassure the child and let them know that they were right to inform you.
- Acknowledge how hard it was for the child to tell you.
- Accept what is being said.
- Allow the child to talk freely.
- Do not criticise the perpetrator, the child might have a relationship with them.
- No promises should be made to the child, for example to keep secrets.
- Stay calm and actively listen with the utmost care to what the child is saying.
- Question normally without pressure and only using open questions such as *"Is there anything else you want to tell me?"* Leading questions should be avoided and questioning should not be extensive.
- Be careful not to ask questions like *"Why didn't you tell me before?"* Instead you could ask *"Have you spoken to anyone else about this?"*
- Staff should not put words in the child's mouth but note the main points carefully.
- Make some brief notes at the time or immediately afterwards.

- As soon as possible a more detailed record should be logged on CPOMS (or Gordian) using the online template. It must be signed and dated, including the time the conversation with the child took place, include an outline of what was said with any comment on the child's body language, etc.
- Inform the child what has to be done next and who has to be told (the DSL as part of agreed procedure).
- Avoid making promises such as *"I'll stay with you"* or *"it'll be ok"*
- The DSL must be immediately informed, unless the disclosure has been made to them.
- The DSL and/or Safeguarding and Child Protection team will engage with the relevant agencies and parents if doing so will not put the child at further risk.

SUPPORTING CHILDREN

We recognise that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. MEPA Training may provide the only stability in the lives of children who have been abused or who are at risk of harm.

MEPA Training will support all children by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the MEPA Training.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.

Supporting children with Special Educational Needs and Disabilities (SEND)

It should be recognised that children who have special educational needs and disabilities may be more vulnerable to abuse. It is important to pay attention to the child protection and safeguarding needs of children with SEND. For example, the special educational need may mean that it is more difficult for the children to communicate a concern. Or children with physical disabilities and need of intimate care may be more vulnerable to inappropriate touching or treatment from an adult providing their care. They may also be more vulnerable to bullying and peer-on-peer abuse.

Children with SEN and disabilities can face additional safeguarding challenges and therefore staff should be aware of the following:

- It is easy to make assumptions that indicators of possible abuse such as changes in behaviour and mood, and injury relate to the child's disability – without further exploration.
- It is easy to make assumptions that children with SEND are more prone to peer group isolation than other children.
- There is potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Children with SEND may experience greater communication difficulties.

To address these additional challenges, schools and colleges should consider extra pastoral support for children with SEN and disabilities.

Further guidance can be obtained as follows:

- DfE: SEND Code of Practice
<https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>

- NSPCC: ‘We have the right to be safe’ – protecting disabled children from abuse
- <https://www.nspcc.org.uk/globalassets/documents/research-reports/right-safe-disabled-children-abuse-report.pdf>

MENTAL HEALTH

Schools have an important role to play in supporting the mental health and wellbeing of their pupils. All staff must be aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff must also be aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education. This can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these adverse childhood experiences can impact the individual.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff are well placed to observe children day to day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

Where staff are concerned that a child’s mental health is also a safeguarding concern, they should inform the DSL.

Lewis Muir is the Designated Senior Mental Health Lead.

Daniel James Greenway and Casey Brett are our Mental Health First Aiders

SPECIAL CIRCUMSTANCES

Looked after children

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child’s looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child’s social worker and the name and contact details of the local authority’s virtual head for children in care.

Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decision about safeguarding and promoting the child’s welfare.

Work Experience

The school has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with statutory guidance.

Children staying with host families

The school may make arrangements for students to stay with host families, for example during a foreign exchange trip or sports tour. When we do, we follow the guidance set out in the statutory guidance to ensure hosting arrangements are as safe as possible.

Schools cannot obtain criminal record information from the Disclosure and Barring Service about adults abroad. Where students stay with host families abroad we will agree with the partner schools a shared understanding of the safeguarding arrangements. Our Designated Safeguarding Lead will ensure the arrangements are sufficient to safeguard our students and will include ensuring students understand who to contact should an emergency occur or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

Some overseas students may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

Private fostering arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will tell the DSL and the school will notify the local authority of the circumstances.

TYPES OF ABUSE

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the MEPA Training and/or can occur between children outside of these environments. All staff but especially the DSL (and DDSL) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as robbery. Further advice can be found in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one 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 cyberbullying, prejudice-based and discriminatory 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 a high level of 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) or 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, MEPA Training 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. The sexual abuse by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and of the MEPA Training's policy for dealing with it.

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.

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It can include psychological, physical, sexual, financial and emotional abuse.

Children can be victims of domestic abuse. Children can witness and be adversely affected by domestic violence and exposure to it can have long lasting negative impact on children.

Where police have been called to a domestic abuse incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the school has up to date safeguarding information about the child.

All staff are aware of the detrimental and long-term impact domestic abuse can have on a child's health, well-being, development and ability to learn. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

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. This is the procedure where police forces are part of Operation Encompass. 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 into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

CSE can occur over time or be a one off occurrence and may happen without the child's immediate knowledge e.g. with others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

If staff are concerned that a child is being sexually exploited the DSL should be informed.

Child Criminal Exploitation (CCE)

Some specific form of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

CCE is common within county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Children can be trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry knives for a sense of protection from harm from others. As children involved in CCE often commit crimes themselves their vulnerability as victims is not always recognised by adults and professionals (particularly older children), and they are not treated as victims. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited is often very different from boys and the indicators may not be the same. However, professionals should be aware that girls are at risk of criminal exploitation too. Boys and girls being criminally exploited may be at higher risk of sexual exploitation.

A child’s involvement in county lines activity often leaves a trail or signs. A child may exhibit some of the signs below. Some potential indicators of county lines involvement and Criminal Exploitation are listed below, with those at the top of particular concern:

- child seems to withdraw from family life
- sudden loss of interest in school or change in behaviour. Decline in attendance or academic achievement (although it should be noted that some children will maintain a good attendance record to avoid coming to notice)
- being emotionally 'switched off', but also containing frustration / rage
- starting to use new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason, or breaking parental rules consistently

- sudden change in appearance – dressing in a particular style or 'uniform' like that of other children they hang around with, including a particular colour
- dropping out of positive activities
- new nickname
- unexplained physical injuries, and / or refusal to seek / receive medical treatment for injuries
- graffiti style 'tags' on possessions, school books, walls
- constantly talking about another person who seems to have a lot of influence over them
- breaking off with old friends and hanging around with one group of people
- associating with known or suspected gang members, closeness to siblings or adults in the family who are gang members
- starting to adopt certain codes of group behaviour e.g. ways of talking and hand signs
- going missing and being found many miles from home with no explanation
- expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past
- being scared when entering certain areas concerned by the presence of unknown youths in their neighbourhoods.

Serious Youth Violence

A gang can be defined as a group of people who associate together or act as an organised body. In the context of gangs and youth violence, a gang is likely to be a relatively durable, predominantly street-based group of people who see themselves (and are seen by the others) as a discernible group who engage in criminal activity and violence, lay claim over territory, have some form of identifying structural feature and who are in conflict with other, similar gangs.

Social economic conditions worsening among some of the most deprived communities increases the appeal to criminal lifestyle choices among children. Children may be attracted to gangs for the following reasons:

- protection
- support
- financial gain
- sense of belonging
- reputation
- they are groomed/ recruited
- peer pressure
- to gain status and respect
- territory
- for excitement
- for money from crime
- to escape negative situations at home such as neglect or abuse
- some children may not even see themselves as being part of a gang.

The signs of involvement in gang and youth violence are similar in many respects to those identified for Child Criminal Exploitation plus, the following:

- Using slang or unknown terms
- Holds unexplained money or possessions or cannot explain where large sums of money have gone (financial exploitation)
- Stays out unusually late without reason

- Sudden change in appearance, for example, dressing in a particular style or ‘uniform’ like that of other young people they hang around with, including a particular colour
- Dropped out of positive activities
- New nickname/ Unexplained physical injuries
- Constantly talking about another young person or adult who seems to have a lot of influence over them
- Broken off with old friends and hangs around with one group of people; Increased use of social networking sites
- Started adopting certain codes of group behaviour e.g. ways of talking and hand signs
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past
- Signs of sexual exploitation e.g. pregnancy, abortion (perhaps forced), sexually transmitted infections and injuries
- Signs of psychological effects of exploitation – depression and suicide attempts for example.

It is important to recognise that girls as well as boys can become involved in gang and youth violence. Girls who are gang members, or who are in some way related to a gang member (friend, cousin, etc.) can be at risk of emotional, physical and sexual violence. They may not realise that what they are being pressured, or choose, to do is wrong, or may feel helpless and scared of what might happen to them if they seek help. Staff who believe a child may be at risk should contact the DSL.

Online Safety

A broad definition of an online incident: 'All fixed and mobile technologies, including all types of social media, that children may encounter, now and in the future, which allows them access to content and communications that could raise issues or pose risks to their wellbeing and safety'.

It is essential that children are safeguarded from potentially harmful and inappropriate material. An effective whole MEPA Training approach to online safety empowers the MEPA Training to protect and educate pupils, students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

[\[Please also refer to Appendix 4 On-line safety guidance\]](#)

- Incidents of an online safety breach will be monitored daily by internal IT Teams and referred to senior leaders using on-line monitoring system, such as ‘e-safe Smoothwall’
- Where there is a data breach the matter will be referred to the Trust’s Data Protection Officer
- The concerns should be communicated with parents of both the victim and perpetrator, where appropriate to do so
- Concerns must be passed onto the relevant agencies where appropriate.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children at risk of abuse online as well as face to face. In many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing and misogynistic messages, the non-consensual sharing of indecent images, especially around group chats and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should speak to the DSL or DDSL.

Youth produced sexual imagery refers to the sending or posting of sexual images of children via mobile phones and other devices or over the internet.

All youth produced sexual imagery incidents will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm we will refer the matter to the police and/or children's social care.

'Honour-based' abuse (HBA)

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt staff should speak to the DSL. If staff have a concern regarding a child that might be at risk of HBA they should speak to the DSL who will use existing national and local protocols for multiagency liaison with police and children's social care.

Female genital mutilation (FGM)

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision, cutting or Sunna. There are no medical reasons to carry out FGM; it is a criminal offence and used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health. Religious, social or cultural reasons are sometimes given for FGM.

A girl or woman who has been a victim of FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from the MEPA Training
- Be particularly reluctant to undergo normal medical examinations
- Ask for help but may not be explicit about the problem due to embarrassment or fear.

If staff have a concern they should immediately speak with the DSL. There is a specific legal duty on teachers: if a teacher in the course of their work in the profession discovers an act of FGM appears to have been carried out on a girl under the age of 18 the teacher **must** report this directly to the police.

Forced Marriage

Forced marriage occurs when a young person under the age of 18 years old, (almost always female) is forced into a marriage that they do not want with someone they have not chosen, following coercion, intimidation, threats and possibly physical and sexual abuse:

- These young women may also become victims of what is termed "honour-based violence"
- Concerns around forced marriage should be referred to the DSL, at which time the student should be spoken with
- The police should also be contacted
- Parents do not need to be informed and social services should likewise be contacted in line with the safeguarding of the student
- The student should be informed that no contact will be made with parents

The Forced Marriage Unit has published multi-agency guidelines, with pages 32-36 focusing on the role of schools. School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is an action that:

- Endangers or causes serious violence to a person/people
- Causes serious damage to property
- Seriously interferes or disrupts an electronic system

and is intended to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

Staff will assess the risk of children in our school being drawn into 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.

Within the school, internet filtering is in place which helps students to stay safe online, alerting staff to any potentially concerning searches.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. 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.

Staff should **always** inform the DSL if they have concerns

Bullying and children who harm, physically or mentally, other children

The Equality Act 2010 requires all Academies to have due regard of the need to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it.

Bullying can be defined as behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, or discriminatory bullying because a child is adopted or has caring responsibilities.

It might be motivated by actual differences between children, or perceived differences. It can take the form of physical or verbal harassment and involves an imbalance of power (a group of children can gang up on a victim or someone who is physically bigger or more aggressive can intimidate someone else, for instance).

Bullying behaviour can include name-calling, teasing, insulting someone (particularly about their weight or height, race, sexual orientation, religion or other personal traits), pushing, hitting, or excluding someone. Relationships between children can and do break down from time to time. To minimise the number of times these differences lead to bullying requires each individual to respect others.

Bullying can be by a single person or by a group (or gang). "Bullying" usually, but not exclusively, has three common elements:

- It is deliberately hurtful
- It is repeated, often over a long period of time
- It is difficult for those being bullied to defend themselves.

The damage inflicted by bullying is often underestimated and can cause considerable distress to children to the extent that it affects their health and development. In the extreme it can cause significant harm, including self-harm.

Safeguarding of children who have been bullied:

- If there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm because of bullying, the MEPA Training will consult and refer such instances immediately to a senior member of the pastoral staff.

- Even when safeguarding is not an issue, the MEPA Training staff may consult and work with external agencies to support pupils/students who are being bullied, or involved in bullying behaviour
- MEPA Training will take seriously any complaints of bullying and will deal with these complaints in line with the MEPA Training behaviour policy.
- Any incident where a child has been the subject of an assault, theft or harassment must be reported to the police at the earliest opportunity via the DSL.
- When there is suspicion or an allegation of a child having been sexually abused or being likely to sexually abuse another child, it should be referred immediately to Children's Social Care or the Police via the DSL and under local procedures.

Cyber-bullying

MEPA Training has a duty of care to all children and staff to ensure they are safe to work, learn and develop unimpeded by fear. Where bullying is found to have taken place by any means, whether on-site or off-site, including cyber-bullying, or sexting, robust action shall be taken to protect the wellbeing of children and staff.

- If children feel they are being bullied by email, text or online, they should talk to their trusted adult.
- Never send any bullying or threatening message.
- Serious bullying should be reported to a member of staff; in some cases the MEPA Training will inform the police - for example, threats of a physical or sexual nature (via sexting for example).
- Keep and save any bullying emails, text messages or images.
- If you can, make a note of the time and date bullying messages or images were sent, and note any details about the sender.
- Children should be taught not to reply to bullying or threatening text messages or emails - this could make matters worse. It also lets the 'bully' know that they have found a 'live' phone number or email address. They may get bored quite quickly if they are ignored.
- Children should be taught not forward abusive texts or emails or images to anyone - which could be breaking the law. Messages should be kept as evidence.
- Children must be taught never to give out passwords to mobile or email accounts
- The MEPA Training will monitor internet use.
- Students should be taught that sending abusive or threatening messages is against the law.

Please also refer to the individual MEPA Training's Acceptable Use policy

Child on child abuse

All staff should be aware that children can abuse other children (often referred to as "child on child abuse") and that this can happen inside and outside of school or online. It is important that staff recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

All staff should understand that even if there are no reported incidents within school it does not mean it is not happening. It may be the case that it is not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to their DSL.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours for example dismissing sexual harassment as 'just banter', 'just having a laugh',

‘part of growing up’ or ‘boys being boys’ can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between peers;
- 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 stand-alone 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
- Consensually and non-consensually nude and semi-nude images and or videos (youth produced sexual imagery)
- Up-skirting, 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 – (this is a criminal offence)
- 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 induce an online element).

Any decisions will be made on a case-by-case basis, with the DSL taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police as required.

The MEPA Training’s initial response to a report from a child is important. It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Each MEPA Training must also address the issue of child on child abuse in their local policies against bullying.

[\[Please see separate Child on child abuse policy\]](#)

Modern Slavery and human trafficking

Trafficking involves transporting, recruiting or harbouring people for the purpose of exploitation, using violence, threats or coercion. When children are trafficked, no violence, deception or coercion needs to be involved, trafficking is merely the act of transporting or harbouring them for exploitative work. When away from their families, they are at the mercy of their employers”

Anti-Slavery <https://www.antislavery.org/>

MEPA Training has a Modern Slavery Statement published on its website and MEPA Training websites. This section in the Child Protection and Safeguarding Policy addresses issues around child slavery and trafficking.

The Modern Slavery Act 2015 makes the prosecution of traffickers easier by consolidating the existing slavery offences, it has increased sentences for slavery offences, bans the prosecution of victims of slavery for crimes they were forced to commit by their traffickers, such as drug production or petty thefts and introduced 'child trafficking advocates' to better protect trafficked children. It requires UK businesses to publicly report on how they tackled slavery in their global supply chains and established an independent Anti-Slavery Commissioner to oversee the UK's policies to tackle slavery.

Children are trafficked for:

- child sexual exploitation
- criminal activity, including: cannabis cultivation, street crime, such as pick pocketing, begging and bag theft, county lines, benefit fraud, immigration fraud and forced marriage.
- domestic servitude, including: cleaning; childcare; cooking.
- forced labour, including working in: restaurants; nail bars; factories; agriculture.
- illegal adoption.
- unreported private fostering arrangements (for any exploitative purpose).

The following signs are indicators that a child may be a modern slave or trafficked:

- They appear to be under the control of someone else and reluctant to interact with others
- they do not have personal identification
- they have few personal belongings, wear the same clothes every day or wear unsuitable clothes for school
- they may not be able to move around freely
- they may be reluctant to talk to strangers or the authorities
- they appear frightened, withdrawn, or show signs of physical or psychological abuse
- they are dropped off and collected for school always in the same way, especially at unusual times, i.e. very early or late.

If you suspect that a child is subject to modern slavery or trafficking report this to the DSL.

At MEPA Training our safeguarding context means we deal with many cases where families are experiencing significant financial hardship, and in turn then the various issues and consequences that come as a result of this situation.

YEAR 12 AND 13 STUDENTS IN CONNECTION WITH LEAF STUDIOS

Student Welfare and Responsibilities – Year 12 and 13

Year 12 and 13 students are enrolled with Leaf Studio, specialising in sport and performing arts academies, but attend their classes at MEPA College in Maidstone, Kent.

Emma Finch remains the Designated Safeguarding Lead (DSL) for all Year 12 and 13 students. She will liaise with the DSL at Leaf Studio as needed to ensure safeguarding protocols are upheld.

Leaf Studio is responsible for students only during college hours and holds no responsibility for incidents that may occur at the student accommodation.

Student accommodation is provided by MEPA College; however, primary responsibility for student welfare lies with parents and carers. MEPA College is committed to ensuring that students are safe and well cared for, both during and outside college hours. Regular inspections are carried out, and any concerns will be promptly communicated to parents and carers.

ATTENDANCE AND CHILDREN MISSING FROM EDUCATION (CME)

A child running away or going missing from education or home is a potential indicator of abuse or neglect. In line with the now statutory “Working Together to Improve School Attendance” (DfE 2024), schools must liaise with children’s services where patterns of absence suggest safeguarding concerns. All staff should follow the MEPA Training’s procedures for dealing with children that go missing from education, particularly on repeat occasions or prolonged periods, to help identify the risk of abuse and neglect, including sexual exploitation, travelling to conflict zones, FGM and forced marriage and to help prevent the risks of their going missing in future. This section must be read in conjunction with the Attendance Policy in each individual MEPA Training.

To assist in the tracking of all children, academies are advised to ‘where reasonably possible’ hold more than one emergency contact number for the children on their roll.

MEPA Training has a responsibility to accurately monitor and record attendance for all of its children, including those with a medical timetable or those who may be dual rolled in alternative provision. For children who move to being electively home educated (EHE), contact should be made with home to clarify this and contact made with the local authority’s Education Welfare Service who should carry out a home visit.

Placing a child on-roll and taking a child off-roll

Academies must place children on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the child will begin attending. If a child fails to attend on the agreed or notified date, the school should notify the local authority at the earliest opportunity to prevent the child from going missing from education.

Where a parent notifies the school that a child will live at another address, all academies are required to record in the admission register:

- the full name of the parent with whom the child will live
- the new address
- the date from when it is expected the child will live at this address.

Where a parent of a child notifies the MEPA Training that the child is registered at another school or will be attending a different school in future, academies must record in the admission register:

- the name of the new school
- the date on which the child first attended or is due to start attending that school.

All academies must inform the local authority of any child who fails to attend school regularly or has been absent without the permission of the MEPA Training for a continuous period of 10 school days or more, at such intervals as are agreed between the MEPA Training and the local authority.

All academies must inform their local authority of any child who is going to be deleted from the admission register where they:

- Have been taken out of the MEPA Training by their parents and are being educated outside the school system e.g. home education.
- Have ceased to attend the MEPA Training and no longer live within reasonable distance of MEPA Training/school at which they are registered.
- Have been certified by a medical officer as unlikely to be in a fit state of health to attend the MEPA Training before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the MEPA Training after ceasing to be of compulsory school age.
- Are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the MEPA Training at the end of that period.
- Have been permanently excluded.

Where a pupil has not returned to school for ten days after an authorised absence or is absent from school without authorisation for twenty consecutive school days, the pupil can be removed from the admission register when the school and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.

Reasonable enquiries may include the appropriate person checking with relatives, neighbours, landlords – private or social housing providers – and other local stakeholders who are involved. They should also record that they have completed these procedures. If there is reason to believe a child is in immediate danger or at risk of harm, a referral should be made to children’s social care (and the police if appropriate.)

Where an MEPA Training/school notifies a local authority that a child’s name is to be deleted from the admission register, the school must provide the local authority with:

- the full name of the child
- the full name and address of any parent with whom the child lives
- at least one telephone number of the parent with whom the child lives
- the full name and address of the parent with whom the child is going to live, and the date the child is expected to start living there, if applicable
- the name of the child’s destination school and the child’s expected start date there, if applicable
- the ground in regulation 8 under which the child’s name is to be deleted from the admission register.

Children accessing Alternative Provision (AP)

- Children attending AP should be monitored by key staff and referrals to be placed into Pupil Entitlement Service when attendance drops below 90%
- For children who are in care, the social worker and virtual school must be contacted before AP placements are discussed. Children with social services involvement should have contact with social workers well in advance of any commencement date.

MEPA Training remains responsible for the safeguarding of any students placed in alternative provision. Written confirmation will be obtained from the provider that relevant checks (including DBS, references,

and training) have been completed. We will maintain the student's full placement address and conduct safeguarding reviews at least once every half-term.

CONFIDENTIALITY, INFORMATION SHARING AND NOTIFYING PARENTS

We recognise that all matters relating to individual cases of child protection are confidential. The Principal or DSL will disclose about a child to other members of staff on a need to know basis only. However, The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Academies have clear powers to share, hold and use information for these purposes.

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.

MEPA Training staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known

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 staff are in any doubt about sharing information, they should speak to the DSL.

Where appropriate, safeguarding staff should discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If the DSL believes that notifying the parents would increase the risk to the child, he/she 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, the DSL will normally notify the parents of all the children involved.

[\[Please see Annex 5 Confidentiality guidance\]](#)

SAFER RECRUITMENT

We will ensure the safe recruitment of staff and all legislation regarding safer recruitment will be followed.

Recruitment and selection process

We will have robust recruitment processes that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools. Where staff are recruited or deployed into alternative provision settings, we ensure all pre-employment checks meet KCSIE 2025 guidance and obtain safeguarding confirmation from the host provider.

This will include:

- Following statutory DBS guidelines re: checks on staff and volunteers (including Enhanced, without Barred List checks, on MEPA Training councillors.)
- Stating clearly on any advertisement or written information relating to employment our commitment to safeguarding children, the safeguarding responsibilities of the post and notification to applicants that it is an offence to apply for roles involving engaging in regulated activities relevant to children if an applicant is barred from such and that open source online searches will be undertaken on shortlisted candidates.
- Requiring a standardised application form. CVs alone are not acceptable.
- All interview panels will have at least one person who is trained in 'Safer Recruitment' and who can pose relevant safeguarding questions. The name of the person with safer recruitment training will be logged on interview notes and in the appointee's file.
- Shortlisted candidates should be asked to complete a signed self-declaration of their criminal record or information that would make them unsuitable to work with children. Safer recruitment questions are asked at interview by a safer recruitment trained individual and gaps and reasons for leaving jobs are challenged. An open source online check should be carried out.
- Use references, including from a senior person from the candidate's current or most recent employer and, where different, the relevant employer from the last time the applicant worked with children.

Pre-appointment vetting checks, regulated activity and recording information

We will undertake the following when appointing individuals:

- Ensuring all relevant pre-employment checks are undertaken before an individual is permitted to start work (e.g. DBS, proof of right to work in the UK, 2 x professional references, prohibition checks, section 128 checks if required, proof of identity (checking the name on the birth certificate, where possible), proof of address). We will also check for disqualification under the childcare act for staff in nursery / reception or before or after school clubs.
- Maintain a single, central record of pre-appointment checks for all staff (including agency and third-party supply staff), volunteers and councillors. MEPA Training will similarly maintain a record for all central staff and trustees.

Other checks for staff, volunteers and others

We will conduct the checks that are necessary on the following categories:

- Individuals who have lived or worked outside the UK - further checks as appropriate to consider any relevant events that occurred outside the UK;
- Agency workers and third party staff – written notification from any agency and or third party that they have carried out the necessary checks (and where an enhanced DBS certificate has disclosed any matter or information, the school has considered the disclosures in the certificate); and that the person presenting at the MEPA Training needs to be checked to ensure they are the same person for whom the agency has provided checks.
- Contractors – safeguarding requirements should be in the contract, including appropriate DBS checks, and appropriate levels of supervision; and the identity of contractors is checked on arrival at schools.

- Trainee/student teachers: MEPA Training will follow the recommendations with regard to trainee teachers as set out in Keeping Children Safe in Education 2023.
- Visitors – for those acting in a professional capacity, there will be an identity and appropriate DBS check and the suitability of any external organisations will be checked.
- Volunteers – a written risk assessment will be conducted.
- Governors – MEPA Training will carry out the necessary checks (including disqualification) on trustees, independent members of main Board sub-committees and MEPA Training council chairs; and MEPA Training council chairs shall ensure checks have been conducted on MEPA Training council members.
- Alternative provision, adults who supervise children on work experience, children staying with host families and private fostering – the necessary checks and notifications will be undertaken.

Ongoing safeguarding and reporting duties

We will continue to be vigilant on safeguarding beyond the recruitment process, including where there are concerns about an individual’s suitability to work with children or there has been a break in service of 12 weeks or more. Senior leaders are aware of the circumstances in which they are required to make a referral to the Disclosure and Barring Service and and/or the Teaching Regulation Agency.

ALLEGATIONS AGAINST STAFF

If an allegation is made against a member of staff, including supply staff, or a volunteer, the Trust’s procedure must be followed. Our Managing safeguarding concerns and allegations about staff, volunteers and contractors is in Appendix 2.

Where staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children, then: This should be referred to the principal.

Where there are concerns/allegations about the principal this should be referred to the LADO or directly to the police. Allegations made against staff who no longer work at the school will be reported to the police.

STUDENT SEXUAL HARRASSMENT AND MISCONDUCT

This policy outlines how MEPA Training will identify and respond to allegations of incidents of sexual misconduct between student members of the Academy, College, Studios, teaching staff, administrators and visitors to the college. Its scope extends to instances of online sexual misconduct.

The purpose of this policy is to outline how we will:

- Raise awareness of the Colleges commitment to dealing with incidents of sexual misconduct, bullying, harassment, and discrimination.
- Set out our expectations around the unacceptability of sexual misconduct.
- Support students or staff members who have experienced any form of sexual misconduct.
- Respond to disclosed incidents which breach this policy. This may be via internal and external support services.
- Provide an environment in which all members of our community feel safe and are respected. Promote an inclusive culture.

For the purposes of this policy, the following terminology is used:

- “The Reporting Party” is the person(s) who has been the subject of the alleged incident of sexual misconduct.
- “The Accused Party” is the person(s) whose behaviour it is alleged amounted to sexual misconduct.
- “Bullying” may be characterised as offensive, intimidating, persistent malicious or insulting behaviour, including an abuse of power to undermine, humiliate or injure the recipient. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.
- “Discrimination” occurs when a person is treated less favourably for a reason related to a protected characteristic.
- “Harassment” is unwanted conduct related to a relevant protected characteristic which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment as defined by the Equality Act 2010. This includes harassment by association or perception.
- “Victimisation” occurs when a person is treated less favourably because they have asserted their rights to raise a complaint under this policy. This also applies to those who have acted as witnesses or supporters of individuals who have complained of harassment, bullying and/or sexual misconduct.
- “Sexual Misconduct” relates to all unwanted conduct of a sexual nature. This includes, but is not limited to:
 - Sexual harassment as defined by Section 26(2) Equality Act 2010.
 - Assault as defined by the Sexual Offences Act 2003.
 - Rape as defined by the Sexual Offences Act 2003.
 - Physical unwanted sexual advances as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017.
 - Intimidation or promising resources or benefits in return for sexual favours as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017.
 - Distributing private and personal explicit images or video footage of an individual without their consent as defined by the Criminal Justice and Courts Act 2015.

Relationship with other policies

MEPA Training acknowledges that sexual misconduct covers a broad range of inappropriate and unwanted behaviours of a sexual nature. This includes behaviour arising at any time when the student or staff member may be regarded as representing MEPA Training as an individual or as part of a team or group and when the student or staff member is at a location away from MEPA Training. It also extends to interactions that take place virtually including email and social media using personal or MEPA Training issued facilities. Students’ / Staffs attention will be drawn to the relevant Handbook provided on enrolment or induction, which outline our ICT policy as well as others such as:

Related MEPA Training Policies:

- Staff Disciplinary Policy
- Discipline Procedure
- Code of Conduct for Staff and Students
- Equality and Diversity Policy
- Safeguarding Policy
- Student Charter

The policy does not prevent individuals from seeking recourse through criminal or civil proceedings. MEPA Training will support students and or staff members in accordance with the law. The policy applies equally to all students and or staff members regardless of any protected characteristics.

Sexual misconduct:

Sexual misconduct may include, but is not limited to:

- Engaging or attempting to engage in sexual intercourse or a sexual act where consent is not or cannot be given
- Sharing another person's private sexual materials without their consent. This may be in person or the sharing on digital images
- Kissing/inappropriately touching without consent
- Inappropriately showing sexual organs to another person
- Making degrading remarks, sounds or gestures of a sexual nature
- Up skirting or concealed viewing or recording of an individual
- Stalking

Consent and the capacity to consent will be taken into consideration in all cases. MEPA Training will take the appropriate steps to ensure all students understand the appropriate terminology and use said terms when investigating alleged instances of sexual misconduct.

MEPA Training's approach:

MEPA Training takes a zero-tolerance approach to all forms of sexual misconduct. MEPA Training is committed to implementing robust measures to safeguard its students and staff from all forms of discrimination and misconduct. MEPA Training recognises that significant long-lasting physical, emotional and psychological impact on those who experience sexual misconduct. This is especially true for those who may have increased vulnerabilities as identified by the Equality Act 2010. MEPA Training will work closely with the member of MEPA Training community and other key stakeholders to ensure said vulnerabilities do not prejudice the reporting and investigation process. Support will also be provided to the members of MEPA Training community (peers, personal tutors, DSL etc.) to whom such experiences are disclosed. MEPA Training recognises its responsibilities for assessing risk factors and putting measures in place to minimise the risk of incidents of sexual misconduct affecting its students.

MEPA Training has three key strategic objectives in seeking to prevent sexual misconduct from affecting members of its community: **Prevent, Respond, Act.**

Prevent sexual misconduct from occurring as follows:

MEPA Training is committed to working towards preventing sexual misconduct from occurring within its community by maintaining a culture and environment in which sexual misconduct is unacceptable. MEPA Training will ensure that its zero-tolerance approach to sexual misconduct is clearly communicated to all students and staff. This may include but not limited to student and staff handbooks, policies, and procedures, talks and events. MEPA Training is committed to ongoing education, raising awareness, and supporting prevention initiatives to combat sexual misconduct from occurring within its community.

Respond to the needs of those who disclose sexual misconduct, whether personally or as a witness as follows:

Any disclosure of sexual misconduct will be treated with sensitivity and understanding. Appropriate support will be provided to any student or staff member that discloses an act of sexual misconduct. This may include calling on internal and external support including law enforcement.

MEPA Training has in place appropriate procedures to respond to any allegation of sexual misconduct, regardless of where the incidents occurred. MEPA Training will seek out the support of its appointed Wellbeing and Safeguarding team.

Ensure that those who have committed acts of sexual misconduct are held to account through the MEPA Training's Student Disciplinary Procedure, Safeguarding Policy, Student Charter or Staff Disciplinary Policy and Procedure and/or the criminal justice system where appropriate:

Any allegation of sexual misconduct against a student or staff member falling within the scope of this policy will be referred for investigation under the MEPA Training's Student or Staff Disciplinary Procedure. Those who have been found to have committed an act of sexual misconduct may be subject to sanctions, including expulsion / instant dismissal.

MEPA Training will ensure that those investigating allegations of sexual misconduct under the Student or Staff Disciplinary Procedure are provided with the appropriate training. Where necessary and appropriate, MEPA Training may appoint a specially trained investigator external to MEPA Training to investigate allegations of sexual misconduct. If necessary and proportionate precautionary action (including suspension) may be taken by MEPA Training against any individual who is accused of an act of sexual misconduct. Where an incident of sexual misconduct falling within the scope of this policy is reported to the police, MEPA Training will liaise with the police as necessary to support its investigation. MEPA Training will not take any action that may prejudice or otherwise interfere with the criminal investigation process in any way. MEPA Training may defer the conclusion of its own investigation until the criminal process is at an end.

Any allegation of sexual misconduct against a member of the MEPA Training's staff will be referred for investigation under the Staff Disciplinary Policy and Procedure. The Safeguarding Policy will be invoked if the student is underage. A referral to a LADO may be required.

In the event of a report that an incident of sexual misconduct has taken place, MEPA Training will undertake a review of its risk assessment and associated documents to consider whether it could have reasonably put in place any steps to prevent the incident from having taken place, together with any additional measures to put in place moving forwards.

These strategic objectives will be reviewed by the MEPA Training's Safeguarding and wellbeing teams on an annual basis and may be updated as necessary and appropriate.

Making a disclosure of sexual misconduct:

It is important to remember that a student or staff member may have overcome a number of barriers in order to disclose. Therefore, it is hugely important that we give them our full attention, listen carefully to what is being said, and reassure the person that what they are saying will be taken seriously. Only ask questions to establish the basic facts, such as when the assault occurred, and whether the student or staff member knows the perpetrator of the offence (to help us to establish if they are in immediate danger). It is essential that we do not investigate. Any pre-trial discussion of the incident can be used in court, and we do not want to jeopardise evidence.

Where MEPA Training is made aware of an allegation made by a student or staff member, staff responsible for Safeguarding will ensure that the individual understands the options available to them in terms of disclosing the allegation to the police and/or for investigation under the MEPA Training's Student Disciplinary Procedure or Staff Disciplinary Policy. Staff must ensure that no pressure is put on the individual to take one course of action over another. The safeguarding staff are also able to provide support and assistance to students or staff where the allegations do not involve another member of MEPA Training community.

Available Support:

The first point of contact for students will be the MEPA Training's safeguarding team who will be responsible for assisting the student to access relevant support services both within and external to the College. Students who disclose having experienced sexual misconduct have the right to determine

what and how much they choose to share about their experience. MEPA Training will not pressure any individual to make a formal disclosure if they do not wish to do so. In some cases, MEPA Training may be required to take certain action without the student’s consent, for example where there are concerns about a risk of significant harm to the student or to a third party. If this is necessary, the student will be informed and supported unless it is not reasonable, possible, or practicable for MEPA Training to do so. MEPA Training is also committed to providing support to any student or staff member against whom an allegation of sexual misconduct is made.

Where help can be found:

Support service	Who	What	Contact details
Internal	Safeguarding, Wellbeing Vice Principal: Emma Finch Principal Mandy Ellen	Onsite support for students / staff who disclose having experienced sexual misconduct	efinch@mepatraining.com mellen@mepatraining.com lmuir@mepatraining.com
External	Sexual Assault Referral Centres (SARC)	SARCs offer medical, practical, and emotional support. They have specially trained doctors, nurses, and support workers. You don't have to report an incident to the police to use a SARC. You can still refer yourself for assessment and medical care. If you do decide to make a report to the police, they can also arrange for you to attend a SARC for medical care and, if you wish, a forensic medical examination. The NHS non-emergency helpline 111 will be able to give details of your nearest SARC, or you can use a postcode search facility.	https://www.cqc.org.uk/guidance-providers/primary-medical-services/sexual-assault-referral-centres
External	Beech House (Kent)	Beech House – The Kent and Medway SARC Sexual Assault Referral Centre (Men, Women, LGBT)	Telephone: 0800 133 7432
External	Rape Crisis England and Wales	At Rape Crisis you'll find the following: How to get help if you've experienced rape, child sexual abuse or any kind of sexual violence. Details of local Rape Crisis services. Information about sexual violence for survivors, people supporting survivors, and information about their work. They also have information on support for men and boys	https://www.survivorsuk.org/

External	Sexual health advice/testing	Boroughwide	STI Tests Bexley Sexual Health: Home Greenwich Sexual Health: Home Sexual Health Services at Lewisham and Greenwich NHS Trust Lewisham and Greenwich
External	Support services	National	https://rapecrisis.org.uk/get-help/ https://www.womensaid.org.uk/ https://lgbt.foundation/helpline https://switchboard.lgbt/ https://www.thesurvivorstrust.org/ https://malesurvivor.co.uk/ https://www.respect.uk.net/

WHISTLEBLOWING IF YOU HAVE CONCERNS ABOUT A COLLEAGUE

It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the Principal, unless the complaint is about the headteacher, in which case concern should be reported to the LADO.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

MEPA Training's Whistleblowing Policy allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.

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

Adopted by MEPA Training Management	APRIL 2025
Review date	APRIL 2026

STUDENT SUPPORT POLICY

Student Support Statement

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.

- **Confidence Building and Motivation Talks**

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) - jcapon@mepatraining.com - Jemma oversees the BTEC Training Program

Andrea Wroe (DDSL) - awroe@mepacademy.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.

<https://forms.office.com/e/iSerWryMtY>

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

APPENDIX 1 ROLES AND RESPONSIBILITIES OF THE DSL

1. The Safeguarding Lead will:

- a. Attend initial training for their role and refresh this within two years.
- b. Keep their knowledge and skills updated at least annually.
- c. Ensure that all staff know who the Designated Safeguarding Lead is, their role and how to make contact.
- d. Ensure that all staff understand their responsibilities in relation to signs of abuse and responsibility to refer any concerns to the Designated Safeguarding Lead. In addition, the Designated Safeguarding Lead should ensure that all staff read and understand Part 1 of Keeping Children Safe in Education 2023 and have a record of when this was done.
- e. The DSL will pay particular attention to training staff, teachers and volunteers who have been unable to attend whole-school safeguarding training days or who join mid-year. The DSL will ensure that new staff participate in safeguarding training as part of their induction.
- f. work with safeguarding partners, including on the local response to sexual harassment and sexual violence in preparing school policies and procedures, and be confident in ensuring local specialist services are accessed.

2. The DSL will ensure that all staff receive safeguarding and child protection updates including online safety and changes to procedure to provide them with relevant skills and knowledge to safeguard children. The DSL will also ensure staff, including all senior leaders and Chairs of Governors and Safeguarding Governors, are kept fully aware of any significant changes or updates to local authority child protection and safeguarding procedures, as and when they occur.

3. The DSL shall help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children are experiencing, or have experienced, with teachers and school and college leadership staff as necessary, including those children who have support from a social worker.

4. The DSL will

- a. Liaise with relevant curriculum leads in setting to ensure Relationship Education, Relationship and Sex Education and Health Education is effectively and appropriately considered within all aspects of the curriculum.
- b. Support teaching staff to provide additional academic support or reasonable adjustments to help children who have had a social worker reach their potential, recognising the lasting impact there can be on children's educational outcome
- c. Oversee child protection records (on CPOMs or equivalent) for each child where concerns have been raised. Ensuring that all concerns, discussions and decisions made and the reasons for those decisions should be recorded. Information should be kept confidential and stored securely. Records should include,
 - i. a clear and comprehensive summary of the concern

- ii. details of how the concern was followed up and resolved
 - iii. a note of any action taken, decisions reached and the outcome.
 - d. When children move to another educational setting, the DSL ensures the receiving school is informed of any concerns and confidential files are transferred. Files should be transferred to a new school within 5 days for an in-year transfer or within the first 5 days of the start of a new term Liaise with primary partner schools to share information and ensure a supported and informed transition from year 6 to year 7.
5. During term time the designated safeguarding lead (or a deputy) should be available on-site during school hours. Where this is not possible, provision should be made to allow contact with the DSL either virtually or by phone.
6. The Designated Safeguarding Lead is expected to:
- a) Refer cases of suspected abuse to the Local Authority Safeguarding hub /MASH and support staff who make referrals.
 - b) Refer cases to the Channel programme where there is a radicalisation concern, as required and support staff who make referrals to the Channel programme.
 - c) Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
 - d) Refer cases where a crime may have been committed to the police, via MASH as required.
 - e) Liaise regularly with the Principal to inform her/him of issues, actions and provide updates around child protection and safeguarding, and be aware of the requirement for children to have an appropriate adult.
 - f) As required, liaise with the Case Manager and where required, the LADO, in all cases involving allegations against members of staff (both current and former members of staff).
 - g) Liaise effectively with staff (especially pastoral support staff, school nurses, IT Technicians, and SENDCOs and Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies of safety and safeguarding, and when deciding whether to make a referral by liaising with relevant agencies.
 - h) To retain oversight of all Early Help plans, and review level or any change in risk at regular intervals.
 - i) Act as a source of support, advice and expertise for staff and MEPA Training councillors
 - j) As well as training all members of staff as above, the DSL and deputies should undergo training to provide them with the skills required to carry out the role. This training must be updated at least every two years. DSLs should be afforded time to allow them to keep up to date with new developments relevant to their roles.
 - k) The DSL and deputies should undertake PREVENT Awareness training and ensure the rest of the staff also do this on at least an annual basis as part of the wider continuous safeguarding training process in operation.
7. There is an expectation that the DSL has a good understanding of:
- a) How to identify, understand and respond to specific needs that can increase the vulnerability of children
 - b) specific harms that can put children at risk
 - c) the important role they play in providing information and support to children's social care in order to safeguarding and promote the welfare of children
 - d) the lasting impact of adversity and trauma can have on education, behaviour and mental health and well-being and what is needed in responding to this
 - e) the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships that facilitate communication.

- f) Children in need (those with disabilities, or relevant health needs, and young carers), who have specific needs that the DSL should be alerted to.

APPENDIX 2 MANAGING SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT STAFF¹, VOLUNTEERS AND CONTRACTORS

MEPA Training takes the safeguarding of its students very seriously and we recognise that it is extremely important that any allegation made against a member of staff (including supply/agency staff), volunteer or contractor is managed quickly and effectively. Allegations are divided into two levels, allegations that may meet the harms threshold and allegations/concerns that do not meet threshold – referred to for this purpose of this guidance as ‘low level concerns’.

All investigating officers should refer to the MEPA TRAINING Disciplinary Management Guidance and the MEPA TRAINING Complaints Policy and seek advice from the DSL, HR and the Local Authority Designated Officer (LADO) throughout the investigation as appropriate. Below outlines framework guidance which will be followed if the reported allegation meets the requirements of the Department for Education statutory guidance for managing allegations that may meet harms threshold, set out in Part 4 of Keeping Children Safe in Education 2023. This is where there is a suspected or alleged member of staff (including supply/agency staff), a volunteer or a contractor) has:

1. behaved in a way that has harmed a child or may have harmed a child (see our Child Protection and Safeguarding Policy for what we mean by ‘harm’);
2. possibly committed a criminal offence against or related to a child; or
3. behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
4. behaved or may have behaved in a way that indicates they may not be suitable to work with children

Procedure for allegations that may meet harms threshold

A) Reporting an allegation

- The safety and welfare of our students is of paramount importance and so all staff must report their allegations or concerns immediately.
- Allegations made against a member of staff, including agency staff, a volunteer or a contractor should be reported to the principal. Allegations involving the principal should be reported to the chair of MEPA Training council. The principal or chair of the MEPA Training council (as appropriate) will then contact the designated officer at the local authority to consider the nature, content and context of the allegation, share information about the child, the subject of the allegation and agree a course of action. The MEPA Training/Trust Designated Safeguarding Lead may also be involved in this discussion. This discussion may include that:
 - no further action is required; or
 - more information is required to determine a course of action; or
 - a strategy discussion should take place; or
 - police or social care should be involved.
- The MEPA Training will always attend a strategy meeting if one is arranged. Representatives from other agencies such as health, social care and police may also be invited to the meeting.

B) Investigating an allegation and considering suspension

- An investigation into the allegation will be undertaken by an appropriate person designated by the principal. This may be an independent advisor or an employee of MEPA TRAINING. The investigator will gather initial information sensitively and without investigating and maintaining confidentiality to enable information sharing and to consider if suspension is appropriate or as alternative to suspending a member

¹¹ Including supply or agency staff

of staff, consideration of moving the child to an alternative class where they won't come in contact with the staff member may be appropriate.

- At the appropriate time, the parent of the child and the accused should be informed of the allegation (following the consideration of advice from HR, the LADO and the outcome of any strategy meeting). No information about the staff member involved can be shared with other staff or parents not directly involved.
- Only the principal is authorised to suspend or to decide to discontinue the use of an agency worker (and only the chair of the MEPA Training council is authorised to lift the suspension, measures must be put in place to support their return to work).
- Suspension is not an automatic response to an allegation and careful consideration as to whether there is cause to suspect the child(ren) is/are at risk of harm or the case is so serious it may be grounds for dismissal, full consideration of alternatives and an audit trail of these must be taken. The Management Guidance for Disciplinary must be followed.
- The principal must make the decision taking into account the views of HR, the LADO and any relevant external agencies e.g. police, children's services.
- Where the member of staff is suspended, they will receive written confirmation within one working day and will be informed of the reason for the suspension.
- The investigating officer will conduct the investigation using the management guidance for disciplinary and will write up a report.
- If the investigating officer deems that a disciplinary hearing is appropriate a hearing will be arranged (see disciplinary policy and procedure and management guidance for disciplinary).
- When determining the outcome of an investigation Part 4 of Keeping Children Safe in Education 2023 states that the following definitions should be used when determining the outcome of the investigation:
 - 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
 - False: there is sufficient evidence to disprove the allegation
 - Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
 - Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made
- In no circumstances would the MEPA Training / Trust cease to use a member of agency staff due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome.

C) Supporting those involved

- The MEPA Training will keep parents or carers informed about the progress of the investigation (when permitted). Where there is no criminal prosecution, the MEPA Training will tell parents or carers the outcome of the investigation. The deliberations of any disciplinary hearing, and the information taken into account in reaching a decision, will not normally be disclosed but the parents or carers of the child will usually be told the outcome in confidence.
- The MEPA Training has a duty of care to its employees and will act to minimise the stress inherent in the investigation process.
 - The person who is the subject of the allegation will be informed of the allegation (when the MEPA Training is permitted to share this information) and likely course of action as soon as possible, usually after the initial discussion with the designated officer. If external agencies have an objection the MEPA Training will work with key stakeholders to agree what information can be disclosed and when.
 - A named representative will be assigned to keep the person who is the subject of the allegation updated on the progress of the case and other school related matters. The MEPA Training will advise the individual of support available to them as well as encouraging them to contact their trade union representative or a colleague.
 - Where an allegation is made against a member of agency staff, the employment agency should provide an additional support to that member of agency staff.

- The agency should also be updated on progress if the subject of the allegations is an agency staff member where appropriate.

D) Resignation

If the individual resigns or the agency staff member or volunteer ceases to provide their service, the investigation into the allegation will be completed. The individual will be given the opportunity to engage with the investigation.

E) Action on conclusion of the case

If the allegation is substantiated and:

- the employee is dismissed or resigns; or
- we cease to use the agency staff member's services as a result of the allegation; or
- we cease to use the volunteer's services as a result of the allegation; the MEPA Training will consider whether a referral to the DBS and/or to the TRA is required.

Where an allegation is found to be false, the MEPA Training may refer the case to social services to determine whether the child needs support and/or to understand if there is a safeguarding reason why the false allegation was made:

- The MEPA Training's behaviour policy sets out the action that may be taken against students who are found to have made unsubstantiated, unfounded, malicious or deliberate invented allegations against staff or volunteers.
- Where an allegation is made against a member of agency staff the outcome of the investigation will be shared with the supply agency and the LADO.

F) Post incident review

It is good safeguarding practice for schools to review incidents upon their conclusion so they can learn from them and continue to improve safeguarding at the MEPA Training. Where allegations are made against staff, including agency staff or volunteers, the MEPA Training may carry out a review at the conclusion of the case.

G) Timescales

Investigations into allegations against staff, including agency staff or volunteers or volunteers will be concluded as quickly and efficiently as possible to ensure that any risks to the child or other children and stress to the individual is minimised as far as possible. Key stakeholders must be kept up to date regularly.

H) Record keeping

Allegations found to be malicious will be removed from the employment record of the individual. For all other allegations, a clear and comprehensive summary of the allegation, how it was followed up and resolved and a note of actions taken and decisions reached will be retained on the employment file. A copy will also be provided to the individual. Details of any allegation made by a pupil will be kept in the confidential section of their record.

Procedure for allegations that do not meet harms threshold

Low level concerns

Creating a culture in which **all** concerns about adults (including allegations that do not meet the harms threshold (see above)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that

adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of MEPA Training

What is a low level concern?

The term low-level concerns does not mean that it is insignificant, it means that the behavior towards a child does not meet the threshold set out above (Points 1-4 of allegations). A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult working in or on behalf of the school 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 referral to the LADO.

Examples of such behavior could include, but not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children with their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating pupils.

Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Low level concerns can arise from a wide range of sources.

It is crucial that any such concerns, including those which do not meet the allegation threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools from potential false allegations or misunderstandings, and a culture of self-referral should be promoted within the school.

Low level concerns about a member of staff, including agency staff, a volunteer or a contractor should be reported to the DSL or DDSL, who will report these to the Principal. Where a low level is raised about the DSL, it should be shared with the Principal. These can be reported confidentially. Whoever the concern is reported to, the Principal will determine the action to be taken, including in the case of supply/agency staff or contractors, their employer being informed.

All concerns should be recorded and include details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concern should also be noted. Academies should decide where these records should be kept, but they must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behavior can be identified. Where such patterns of behaviour are identified MEPA Training should decide on the course of action, either through disciplinary procedures or where a pattern of behaviour moves from a concern to meeting harms threshold, in which case it should be referred to the LADO. If in doubt, the LADO should be consulted.

APPENDIX 4 ONLINE SAFETY GUIDANCE

1. AIMS

MEPA Training aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and MEPA Training partners;
- Deliver an effective approach to online safety, which empowers us to protect and educate the whole school community in its use of technology;
- Establish clear mechanisms to identify, intervene and escalate an incident, where appropriate.

2. LEGISLATION AND GUIDANCE

This policy is based on the Department for Education's (DfE) statutory safeguarding guidance, Keeping Children Safe in Education 2025, and its advice for schools on:

- Teaching online safety in schools
- Preventing and tackling bullying and cyber-bullying: advice for senior leaders and school staff
- RSE
- Searching, screening and confiscation

It also refers to the Department's guidance on **protecting children from radicalisation**.

It reflects existing legislation, including but not limited to the **Education Act 1996** (as amended), the **Education and Inspections Act 2006** and the **Equality Act 2010**. In addition, it reflects the **Education Act 2011**, which has given teachers stronger powers to tackle cyber-bullying by, if necessary, searching for and deleting inappropriate images or files on pupils' electronic devices where they believe there is a 'good reason' to do so. The policy also takes into account the National Curriculum computing programmes of study.

The breadth of issues classified within online safety is considerable, but can be categorized into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalization and extremism.
- Contact: being subjected to harmful online interaction with other users; for example; 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: personal online behaviour that increases the likelihood of, or causes harm; for example, making, sending and receiving explicit images; and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

3. ROLES AND RESPONSIBILITIES

3.1 The Principal

The headteacher is responsible for ensuring that staff understand this guidance and that it is being implemented consistently throughout the school.

3.32 The DSL

Details of the school's DSLs are set out in MEPA TRAINING's Safeguarding policy. The DSL takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand online safety guidance and that it is being implemented consistently throughout the school
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents

- Ensuring that any online safety incidents are logged and dealt with appropriately in line with this guidance
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school
- Providing regular reports on online safety in school to the headteacher and/or governing board

This list is not intended to be exhaustive.

3.3 The ICT manager is responsible for:

- Putting in place appropriate filtering and monitoring systems, which are updated on a regular basis and keep students safe from potentially harmful and inappropriate content and contact online while at school, including any potential extremist material.
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly.
- Conducting a full security check and monitoring the school's ICT systems, including pupil use of the internet on a weekly basis, reporting any anomalies to the DSL.
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files.
- MEPA Training uses filtering and monitoring systems aligned with the DfE's "Plan Technology for Your School" standards. We also consider AI-specific safety expectations outlined in the DfE's "Generative AI: Product Safety Expectations" to protect against emerging digital threats.

This list is not intended to be exhaustive.

3.4 All staff and volunteers

All staff, including contractors and agency staff, and volunteers (where appropriate) are responsible for:

- Maintaining an understanding of this guidance and implementing it consistently
- Agreeing and adhering to the terms on acceptable use of MEPA TRAINING's ICT systems and Acceptable Use policy
- Working with the DSL to ensure that any online safety incidents are logged and dealt with appropriately
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

3.5 Parents

Parents are expected to:

- Notify a member of staff or the principal of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of MEPA TRAINING's ICT and Acceptable Use policies.

Parents can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? - **UK Safer Internet Centre**
- Hot topics - **Childnet International**
- Parent factsheet - **Childnet International**

3.6 Visitors and members of the community

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this guidance (within the Safeguarding Policy) where relevant.

4. ONLINE SAFETY: MISINFORMATION, DISINFORMATION, CONSPIRACY THEORIES

Emerging Harms

KCSIE 2025 recognises misinformation, disinformation and conspiracy theories as key online harms. Staff should be aware that these forms of content may contribute to radicalisation, mental health issues, and unsafe decision-making. The curriculum and digital literacy training will aim to develop student resilience against such content.

5. EDUCATING STUDENTS ABOUT ONLINE SAFETY

Students will be taught about online safety as part of the curriculum:

From September 2021, **Relationships education and health education (KS1-2)** and **Relationships and sex education and health education (KS3-4)** will be part of the national curriculum. Students will be taught about online safety as part of this.

In **Key Stage 3**, students will be taught to:

- Understand a range of ways to use technology safely, respectfully, responsibly and securely, including protecting their online identity and privacy
- Recognise inappropriate content, contact and conduct, and know how to report concerns

Students in **Key Stage 4** will be taught:

- To understand how changes in technology affect safety, including new ways to protect their online privacy and identity
- How to report a range of concerns

By the **end of KS4**, they will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviour
- The safe use of social media and the internet will also be covered in other subjects where relevant.
- The school will use assemblies to raise pupils' awareness of the dangers that can be encountered online and may also invite speakers to talk to students about this.

By the end of school, they will know:

- Their rights, responsibilities and opportunities online, including that the same expectations of behaviour apply in all contexts, including online
- About online risks, including that any material someone provides to another has the potential to be shared online and the difficulty of removing potentially compromising material placed online
- Not to provide material to others that they would not want shared further and not to share personal material which is sent to them
- What to do and where to get support to report material or manage issues online
- The impact of viewing harmful content
- That specifically sexually explicit material (e.g. pornography) presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners
- That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail
- How information and data is generated, collected, shared and used online
- How to identify harmful behaviours online (including bullying, abuse or harassment) and how to report, or find support, if they have been affected by those behaviour
- The safe use of social media and the internet will also be covered in other subjects where relevant.
- The school will use assemblies to raise pupils' awareness of the dangers that can be encountered online and may also invite speakers to talk to students about this.
- The appropriate etiquette, behaviours and professionalism of social media and online activity.

5. EDUCATING PARENTS ABOUT ONLINE SAFETY

The school will raise parents' awareness of internet safety in letters or other communications home, and in information via our website or virtual learning environment (VLE) in each MEPA Training.

Online safety will also be covered during information evenings.

If parents have any queries or concerns in relation to online safety, these should be raised in the first instance with the headteacher and/or the DSL.

Concerns or queries about this policy can be raised with any member of staff or the headteacher.

6. CYBER-BULLYING

6.1 Definition

Cyber-bullying takes place online, such as through social networking sites, messaging apps or gaming sites. Like other forms of bullying, it is the repetitive, intentional harming of one person or group by another person or group, where the relationship involves an imbalance of power. (See also the MEPA Training behaviour policy.)

6.2 Preventing and addressing cyber-bullying

To help prevent cyber-bullying, we will ensure that students understand what it is and what to do if they become aware of it happening to them or others. We will ensure that students know how they can report any incidents and are encouraged to do so, including where they are a witness rather than the victim.

The academy/college will actively discuss cyber-bullying with pupils, explaining the reasons why it occurs, the forms it may take and what the consequences can be. Academy tutors will discuss cyber-bullying with their tutor groups, and the issue will be addressed in assemblies and explicitly in PSHE.

Teaching staff are also encouraged to find opportunities to use aspects of the curriculum to cover cyber-bullying. This includes personal, social, health and economic (PSHE) education, and other subjects where appropriate.

The school also provides information on cyber-bullying to parents so that they are aware of the signs, how to report it and how they can support children who may be affected.

In relation to a specific incident of cyber-bullying, the school will follow the processes set out in the MEPA Training behaviour and MEPA TRAINING safeguarding policies. Where illegal, inappropriate or harmful material has been spread among pupils, the school will use all reasonable endeavours to ensure the incident is contained.

The DSL will consider whether the incident should be reported to the police if it involves illegal material and will work with external services if it is deemed necessary to do so.

6.3 Examining electronic devices

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on pupils' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules
- If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:
 - Delete that material, or
 - Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
 - Report it to the police

Any searching of students will be carried out in line with the DfE's latest guidance on **screening, searching and confiscation**.

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

7. ACCEPTABLE USE OF THE INTERNET IN SCHOOL

All pupils, parents, staff, volunteers and councillors are expected to sign an agreement regarding the acceptable use of the school's ICT systems and the internet. Visitors will be expected to read and agree to the school's terms on acceptable use if relevant.

Use of the school's internet must be for educational purposes only, or for the purpose of fulfilling the duties of an individual's role.

We will monitor the websites visited by pupils, staff, volunteers, councillors and visitors (where relevant) to ensure they comply with the above.

8. STAFF USING WORK DEVICES OUTSIDE SCHOOL

Staff members using a work device outside school must not install any unauthorised software on the device and must not use the device in any way which would violate the trust's terms of acceptable use.

Staff must ensure that their work device is secure and password-protected, and that they do not share their password with others. They must take all reasonable steps to ensure the security of their work device when using it outside school. Any USB devices containing data relating to the school must be encrypted.

If staff have any concerns over the security of their device, they must seek advice from the ICT manager.

Work devices must be used solely for work activities.

9. HOW THE SCHOOL WILL RESPOND TO ISSUES OF MISUSE

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in the trust's Acceptable Use policy. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with staff disciplinary procedures. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

10. TRAINING

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

The DSL will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Staff will be able to access specific training on safe internet use and online safeguarding issues as part Educare modules.

Volunteers will receive appropriate training and updates, if applicable.

More information about safeguarding training is set out in MEPA TRAINING's safeguarding policy

11. STUDENTS USING SOCIAL MEDIA

- Students must use reasonable etiquette, the same as they would off line.
- Students must show respect – what you say online is a permanent record, so don't say anything online you wouldn't feel comfortable saying in person.
- Under no circumstance should a student private message a teacher via any social media account.

- If you would like to make a teacher aware of something, please use the office or email or Facebook group.
- No performances are allowed to be videoed unless by an official employee of MEPA Training.

12. USE SOCIAL MEDIA

For our use of social media please see our 'Communication with Parents/Carers Policy'.

MEPA Training will publish and share information via its social media channels. Below are the links to each channel which can either be followed, liked or shared.

	Facebook	Instagram	Tiktok	Youtube
MEPA Studios	https://www.facebook.com/mandyellenperformingartsschool	https://www.instagram.com/mepa_studios		
MEPA Academy	https://www.facebook.com/profile.php?id=100069506911627	https://www.instagram.com/mepaacademy/	https://www.tiktok.com/@mepaacademy	
MEPA College	https://www.facebook.com/MEPAUK	https://www.instagram.com/mepa_college/		https://www.youtube.com/@MepaCollege
MEPA Training			https://www.tiktok.com/@mepa_training	https://www.youtube.com/@mepatraining

Each business also has a Facebook group which information is also shared in. In order to join these, parents/carers and/or students will need to friend Mandy Ellen who will then add. These Facebook groups are for quick information/communications that are to be shared by management and class teachers.

13. LINKS WITH OTHER POLICIES

This online safety policy is linked to our:

- Child protection and safeguarding policy
- Behaviour policy
- Staff disciplinary procedures
- Data protection policy and privacy notices
- Complaints procedure
- ICT and internet acceptable use policy

APPENDIX 5 CONFIDENTIALITY GUIDANCE FOR STAFF

One-to-one disclosures to members of MEPA Training staff (including voluntary staff):

All members of staff know the limits of the confidentiality they can offer to both students and parents/carers (see note below) and any required actions and sources of further support or help available both for the student or parent/carer and for the staff member within the MEPA Training and from other agencies, where appropriate. All staff should encourage students to discuss difficult issues with their parents/carers and vice versa. However, the needs of the student are paramount and MEPA Training staff will not automatically share information about the student with parents/carers unless it is considered to be in the child's best interests. This includes safeguarding files held on students where this is not considered to be in the child's best interests.

Disclosures to a counsellor, school nurse or health professional operating a confidential service in the MEPA Training.

Health professionals such as school nurses can give confidential medical advice to students provided, they are competent to do so and follow the guidelines for doctors and other health professionals on consent giving (Gillick Competence) and provision of medical advice regarding sexual health to under 16s (Fraser Guidelines). Such professionals are skilled in discussing issues and possible actions with young people and always have in mind the need to encourage students to discuss issues with their parents or carers. However, the needs of the student are paramount and the professional will not insist that a student's parents or carers are informed about any advice or treatment they give although safeguarding will be followed.

Contraceptive advice and pregnancy

The Department of Health has issued guidance (July 2004) which clarifies and confirms that health professionals owe young people under 16 the same duty of care and confidentiality as older patients in relation to the provision of advice and treatment on contraception, sexual and reproductive health, including abortion. It sets out principles of good practice in providing contraception and sexual health advice to under 16s. The duty of care and confidentiality applies to all under 16s. Whether a young person is competent to consent to treatment or is in serious danger is judged by the health professional on the circumstances of each individual case, not solely on the age of the patient. However, the younger the patient the greater the concern that they may be being abused or exploited. The DH guidance makes it clear that health professionals must make time to explore whether there may be coercion or abuse. Cases of grave concern would be referred through school safeguarding procedures. It is practice at this MEPA Training and with the health professionals working within this MEPA Training that any sexual activity involving a young person below the age of 13 years is automatically dealt with as a child protection issue, as it is deemed that anyone under 13 years of age is not able to give consent to sexual activity.

Specific procedures to be used when dealing with medical confidences

- Staff will advise the DSL of any issue or concern and will explain to the student the necessity of the DSL dealing with the issue.
- The DSL will encourage but cannot force the student to talk to and seek the support of a parent. The DSL may offer to help the student in doing this. If the parent is informed by the student, the parent then becomes responsible for any subsequent action and the member of staff no longer has any responsibility for the matter. The DSL will check with the student that the parent has been informed and tell the student that their parent must contact the DSL to discuss (or DSL will contact parent/carer). The DSL will

make a written record of any discussion. If the DSL is concerned that the parent has not been informed even though the student claims they have, the DSL will take further advice from professional colleagues as appropriate.

- In the event of a refusal to discuss the concern with a parent, the DSL will put the student in touch with an appropriate health professional e.g. the School Health Advisor or the student's GP. Any subsequent decisions regarding informing the parent then becomes the responsibility of that particular professional.
- Staff may give students general information about contraception but will not recommend a specific form of contraception. Students will be encouraged to seek advice from the local NHS provision for sexual health or speak with the DSL for further signposting. All disclosures about unprotected sex within the preceding 72 hours will be referred to an appropriate source for emergency contraception and advice.
- It is important to be aware that a student may be offered a confidential termination of pregnancy by a medical professional. **This reflects a professional judgement by qualified medical professional which the MEPA Training does not have the right to overturn.**
- Any continued pregnancy requires parental support. If a student refuses to inform their parent or fails to seek medical advice Child Protection procedures may then be instigated. In addition, if the girl is under the age of 13 years, it is also a requirement that Social Services and the Police are informed of the pregnancy.

Complex cases:

Where there are areas of doubt about the sharing of information, we will seek a consultation with the local Safeguarding Children Multi-Agency Partnership or the local Integrated Front Door (IFD).

For further information, please see:

<https://www.fpa.org.uk/factsheets/under-16s-consent-and-confidentiality-sexual-health-services#refs>