Child on Child Abuse Policy

Including sexual violence and sexual harassment between children

Approved by:	Board of Trustees	**Date:**	9th July 2026
Last reviewed on:	1ST July 2026		
Next review due by:	1ST July 2027		
Name of Designated Safeguarding Lead	Laura Tranter		

Contents

1. Statement of Intent 4
2. Legal Framework 4
3. Definitions 5
4. Roles and Responsibilities 6
5. Types of Child-on-Child Abuse 7
5.1 Physical abuse 8
5.2 Sexual abuse 8
5.3 Bullying 8
5.4 Online abuse 8
5.5 Sharing nude and semi nudes or indecent imagery 9
5.6 Initiation/Hazing 9
5.7 Discriminatory behaviour 9
5.8 Intimate partner abuse 9
6. A Whole-School Approach to Tackling Child-on-Child Abuse 9
6.1 School Culture 10
6.2 Curriculum 10
7. Protecting Pupils with Increased Vulnerability to Child-on-Child Abuse 11
7.1 Girls 11
7.2 LGBTQ+ pupils 11
7.3 Pupils with SEND 12
7.4 Black, Asian and other ethnic groups pupils 12
8. Channels for Pupils to Report Abuse 12
9. Staff Identifying and Reporting Concerns 12
10. Handling Allegations of Abuse against Pupils 13
10.1 Confidentiality 14
10.2 Anonymity 14
10.3 Risk Assessment 15
10.4 Taking Action Following a Disclosure 15
10.5 Managing the Report 15
10.6 Managing Internally 16
10.7 Providing Early Help 16
10.8 Referral to Children's Social Care 16
10.9 Reporting to the police 16
10.10 Bail conditions 17
10.11 Managing delays in the criminal justice system 17
10.12 The end of the criminal process 17
10.13 Ongoing support for the victim 17

10.14 Ongoing support for the alleged perpetrator 18
10.15 Disciplining the alleged perpetrator 18
10.16 Shared classes 19
10.17 Working with parents 19
10.18 Safeguarding other pupils 19
11. Monitoring and review 20
12. Appendix A 21

1. Statement of Intent

The school is committed to safeguarding and promoting the welfare of every pupil, both inside and outside of the school premises, and is aware that abuse against children can be inflicted by other children. We implement a whole-school preventative approach to managing child-on-child abuse, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of mutual respect amongst all pupils.
- Teaching pupils about behaviour that is acceptable and unacceptable.
- Identifying and making provision for any pupil that has been subject to abuse.
- Ensuring that members of the governing board, the Headteacher and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child-on-child abuse and know to refer concerns to the DSL.
- Ensuring that safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils and parents.

The DSL is **Laura Tranter** In the absence of the DSL, child protection matters will be dealt with by **Chris Crook, Karla Thorley, Mandy Cox or Eleri Holmes** (DDSL's).

2. Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- Equality Act 2010
- Human Rights Act 1998
- Sexual Offences Act 2003
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- DfE (2026) 'Working together to safeguard children'
- DfE (2026) 'Keeping children safe in education 2026'.

The policy also has regard to the following non-statutory guidance:

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- National Police Chief's Council (2020) 'When to call the police: guidance for schools and colleges'.

This policy operates in conjunction with the following school policies:

- Child Protection and Safeguarding Policy
- Behaviour Policy (including Suspension and Exclusion Policy)
- Data Protection Policy
- Anti-bullying Policy

- Online Safety Policy
- Staff Code of Conduct
- Attendance Policy (including Children Missing Education Policy)
- Relationships and Sex Education policy (RSE)
- Personal, Social, Health, Citizenship and Emotional Education (PSHE).

Child on Child abuse is addressed in Part 5 of the Keeping Children Safe in Education 2026 document. Further information and support can be found in this document.

In KCSIE 2026 the use of the word exploitation has been included throughout the document to highlight that exploitation is a key Child Protection concern. Exploitation can take many forms and children can be exploited by adult males or females, as individuals or groups. Children may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case it is important that the child perpetrator is also recognised as a victim. We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse.

3. Definitions

"Child-on-child abuse" is defined, for the purposes of this policy, as any form of abuse inflicted by one child or a group of children, i.e. individuals under the age of 18, against another child or group of children. This policy covers child-on-child abuse both inside and outside of school and both in person and online. The term outside of school includes risks outside of the home, including peer groups, online environments and the wider community.

"Harmful sexual behaviour" is defined as any sexual behaviour which:

- Does not observe and respect any individuals on the receiving end of the behaviour, e.g. touching someone without their consent
- Is inappropriate for the age or stage of development of the pupil
- Is problematic, abusive or violent
- May cause developmental damage.

Please note: Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two.

This policy will use the following terms to describe pupils involved in child-on-child abuse:

- **Victim(s)** – the individual(s) against whom the abuse has, or has allegedly, been inflicted
- **Perpetrator(s)** – the individual(s) exhibiting abusive behaviour against their peers
- **Alleged perpetrator(s)** – individual(s) against whom a report of abusive behaviour has been made, where guilt has not yet been ascertained.

Please note: The use of the word 'alleged' does not mean that the pupil in question is not guilty of child-on-child abuse, that the school does not believe the allegation, or that the allegation will not be taken seriously. Staff will remember that the school has a legal duty of care to all perpetrators and alleged perpetrators who are pupils at the school, including a requirement to ensure they can access their education. Staff will also keep in mind that, in some cases, the abusive behaviour will have been harmful to the perpetrator as well. Victims will be reassured that use of the term 'alleged perpetrator' is not an attempt to discredit their allegation.

Staff will also be conscious of the fact that not everyone who has been subjected to abuse considers themselves a victim or would want to be described this way. Staff will be prepared to use any term which the individual child is most comfortable. Staff will think very carefully about terminology when speaking in front of pupils, and the use of appropriate terminology will be determined on a case-by-case basis.

4. Roles and Responsibilities

The Governing Board has a duty to:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Hold the school to account for its obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'
- Confirm that the school's arrangements for handling child-on-child abuse take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, ensuring that they are trained to the same standard as the DSL, and that the role is explicit in their job description(s)
- Ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post
- Ensure the DSL is given the additional time, funding, training, resources and support needed to carry out the role effectively
- Make sure that pupils are taught about child-on-child abuse, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- Ensure that staff members are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+
- Ensure the school has clear systems and processes in place for identifying possible risk of harm in pupils, including clear routes to escalate concerns and clear referral and accountability systems
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation in relation to child-on-child abuse
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils
- Guarantee that there are systems in place for pupils to express their views and give feedback
- Ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction that is regularly updated, in order to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust, whole-school approach to safeguarding.

The Headteacher has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession
- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members
- Provide staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Code of Conduct, part one and, where appropriate, Annex A of the 'Keeping children safe in education' (KCSIE) guidance, the Behaviour Policy, the attendance policy (including Children Missing Education), online safety training, and the identity of the DSL and any deputies

- Ensure staff receive training on recognising indicators of abuse, including harmful sexual behaviour and online safety, and handling disclosures or concerns about a pupil
- Ensure that the school operates in line with local safeguarding partnership arrangements, and will have regard to local threshold documents and procedures when making decision about referrals and early help.

The DSL has a duty to:

- Understand and keep up to date with local safeguarding arrangements
- Act as the main point of contact with the three safeguarding partners and the child death review partner
- Make the necessary child protection referrals to appropriate agencies
- Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) guidance
- Liaise with the Headteacher to inform them of safeguarding issues and ongoing enquiries
- Liaise with the Deputy DSL(s) to ensure effective safeguarding outcomes.
- Act as a source of support for pupils who have been abused by, or who have abused, other pupils
- Lead the school in taking a preventative approach to child-on-child abuse.
- Actively participate in multi-agency safeguarding arrangements, including strategy discussions, child protection conference, core groups and other relevant meetings, and will contribute to assessments and plans.
- Ensure that the voice of the child is central to all safeguarding processes, and that children are supported to express their views, wishes and feelings at every stage.

Other staff members have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties
- Provide a safe environment in which pupils can learn and play
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation in relation to child-on-child abuse
- Maintain an attitude of 'it could happen here' where safeguarding is concerned
- Be aware of the signs of abuse and understand that children can be at risk of harm inside and outside of the school, inside and outside the home, and online
- Adhere to the early help process and understand their role in it
- Understand and adhere to the procedure to follow in the event that a child confides they are being abused by a peer
- Understand that children may not feel ready or know how to tell someone that they are being abused, and/or they may not recognise their experiences as harmful
- Understand that technology is a significant component in many safeguarding issues
- Support social workers in making decisions about individual children, in collaboration with the DSL
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child
- Understand the importance of challenging inappropriate behaviours between children that are abusive in nature
- Build trusted relationships with children and young people which facilitate communication.
- Ensure that the voice of the child is central to all safeguarding processes, and that children are supported to express their views, wishes and feelings at every stage.

5. Types of Child-on-Child Abuse

Staff will familiarise themselves with the forms that child-on-child abuse can take, including but not limited to:

5.1 Physical abuse
A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to another child.

5.2 Sexual abuse
A form of abuse involving sexual activity between children – sexual abuse, for the purposes of this policy, is divided into two categories: sexual violence and sexual harassment.

"Sexual violence" encompasses the definitions provided in the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, i.e. non-consensual sexual touching, and causing another child to engage in sexual activity without consent, e.g. forcing someone to touch themselves sexually.

"Sexual harassment" refers to any sexual behaviour that could violate another child's dignity, make them feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment, including:

- Sexualised jokes, taunting or comments
- Physical behaviour, e.g. deliberately brushing against someone
- Online sexual harassment, including:
    - Upskirting, (which is a criminal offence), typically involves taking a picture under a persons 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
- Sexualised online bullying
- Unwanted sexual comments and messages, including on social media
- Sexual threats or coercion.

The **"sharing of sexualised imagery"** can also constitute sexual harassment – this refers to the consensual and non-consensual sharing between pupils of sexually explicit content, including that which depicts:

- Another child posing nude or semi-nude
- Another child touching themselves in a sexual way
- Any sexual activity involving another child
- Someone hurting another child sexually.

Staff will be aware that children creating, possessing, and distributing indecent imagery of other children is a criminal offence, even where the imagery is created, possessed, and distributed with the permission of the child depicted, or by the child themselves. Incidents of sharing sexualised imagery will be handled in line with the Child Protection and Safeguarding Policy.

5.3 Bullying
Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything.

Bullying is acted out through the following mediums:

- Verbally
- Physically
- Emotionally
- Online (cyberbullying)
- Prejudiced based bullying
- Discriminatory bullying.

Bullying will generally be handled in line with the Anti-bullying Policy; however, particularly severe instances will be handled in line with this policy and the Child Protection and Safeguarding Policy.

5.4 Online abuse

This involves the use of technology and the internet in order to harass, threaten or intimidate another child, and includes exposure to misinformation, disinformation and conspiracy theories. Instances of online abuse will be managed in line with this policy, the Online Safety Policy and the Anti-bullying Policy.

5.5 Sharing nude / semi-nude or indecent imagery
Nude/semi-nude or indecent imagery, videos and/or written messages with sexually explicit content are often created and sent electronically. They are often shared via social networking sites and instant messaging services.

This must always be referred immediately to the Designated Safeguarding Lead. The DSL will follow the DfE Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance.

Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK

5.6 Initiation/Hazing
Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The ceremony welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment. This may also be an indicator of wider exploitation such as Child Sexual Exploitation (CSE) and/or Child Criminal Exploitation (CCE) and/or County Lines.

5.7 Discriminatory behaviour
Discriminatory behaviour encompasses abuse inflicted on a pupil because of their protected characteristics, e.g. religion, ethnicity, gender, sexual orientation, culture, or any SEND. Discriminatory behaviour is never acceptable, and all cases will be handled in line with this policy and the Child Protection and Safeguarding Policy.

In accordance with the Equality Act 2010, schools will not tolerate unlawful discrimination against pupils because of any protected characteristics they may have.

5.8 Intimate partner abuse
This involves a romantic partnership between children in which one or both partners are emotionally, physically or sexually abusive to the other (sometimes known as 'teenage relationship abuse'). This could include:

- Repetitive insults
- Controlling behaviour, e.g. preventing a child from socialising with others or deliberately isolating them from sources of support
- Sexual harassment
- Threats of physical or sexual abuse.

The school will manage intimate partner abuse in the same way as a case of abuse between any other children, i.e. via the processes outlined in the Handling allegations of abuse against pupils section of this policy, and in line with the Child Protection and Safeguarding Policy.

Staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

6. A Whole-School Approach to Tackling Child-on-Child Abuse

The school will continue to involve all members of the school community, including the governing board, staff, pupils, parents and other stakeholders, in creating a whole-school approach to child-on-child abuse. The school will work in partnership with parents and carers, where appropriate, to promote welfare of children and to support early intervention, unless doing so would place the child at increased risk of harm.

The Governing Board will ensure that keeping children safe and protected from harm, including child-on-child abuse, is central to all policies and procedures implemented across the school. The school will ensure that procedures for handling child-on-child abuse are transparent, clear and understandable, and are readily accessible to any member of the school community who wishes to access them.

The school will implement a contextual approach to safeguarding pupils against child-on-child abuse, and will ensure that all procedures take into account incidents of child-on-child abuse that occur outside of school or online. Where appropriate schools will work with local safeguarding partners to support this.

The Headteacher will ensure that all staff receive adequate training on handling child-on-child abuse.

6.1 School Culture

The school will prioritise cultivating a safe and respectful environment amongst pupils and ensure that all pupils are aware that the school will adopt a **zero-tolerance stance** on child-on-child abuse of any kind.

The school will promote respectful interactions amongst pupils, and all staff will model appropriate and respectful behaviour. Staff will take care to avoid normalising harmful behaviour, particularly harmful sexual behaviour, e.g. by refraining from the use of phrases (e.g. such 'just having a laugh') as these phrases can lead to a culture of unacceptable behaviours and normalised abuse. The school will not tolerate or dismiss abusive behaviour as 'banter', 'a joke' or 'part of growing up'.

The school will ensure that wider societal factors that exacerbate the problem of child-on-child abuse are reflected in its approach to creating a preventative culture. This means that individuals who are more likely to be abused, e.g. girls or LGBTQ+ pupils, or who are at increased risk of acting as a perpetrator in abusive situations, e.g. due to abusive home situations or anger management issues, are given additional support from an early stage. The school will have a clear set of values and standards that will be upheld and demonstrated throughout all aspects of school life and will be underpinned by the school's policies, procedures and curriculum.

The school will manage all early help and intervention for pupils that show early signs of harmful behaviour, or early signs of being the victim of harmful behaviour, in line with the Child Protection and Safeguarding Policy.

6.2 Curriculum

The school maintains the position that education surrounding respectful and healthy attitudes and behaviour towards others is the best way to combat child-on-child abuse in the school. All staff, not just teaching staff, will be responsible for passing this knowledge on to pupils.

In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum and extra-curricular activities.

The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. This includes the creation and sharing of AI-generated or digitally manipulated sexual imagery (deepfakes), which may be used to harm, exploit or coerce pupils. The school will also teach a planned programme of evidence-based RSE, delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such content will be fully inclusive, age and stage of development appropriate (especially when considering the needs of pupils with SEND), and tackle issues such as the following:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- How to recognise an abusive relationship, including coercive and controlling behaviour

- LGBTQ+ identities and relationships
- Body confidence and self-esteem
- Being clear that sexual violence and sexual harassment are never the fault of the person experiencing it.
- The concepts of, and laws relating to all forms of sexual harassment, and abuse, and how to access support
    - Sexual exploitation
    - Grooming
    - Harassment
- What constitutes as sexual violence and sexual harassment and why these are always unacceptable.

Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They will be taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

The curriculum will ensure that pupils of all ages are taught about and understand the concept of consent and its importance in an age-appropriate way.

The school will continue to maintain robust filtering and monitoring systems to support in identifying online risks to pupils. These will be used proactively to identify safeguarding concerns, including child-on-child abuse, and inform early intervention. Concerns identified through filtering and monitoring systems will be reviewed promptly by appropriate safeguarding staff and responded to in line with the OCT Child Protection and Safeguarding Policy.

7. Protecting Pupils with Increased Vulnerability to Child-on-Child Abuse

The school is aware that, while child-on-child abuse can be perpetrated by, and against, anyone, there are certain groups of pupils who are at an increased risk of being on the receiving end of child-on-child abuse.

Staff will be careful to acknowledge the increased risk certain pupils face while refraining from making assumptions about the nature of any reported, witnessed or suspected abuse. Staff will be aware that pupils who are generally at increased risk of abuse can also be perpetrators of abuse.

The school will ensure that action is taken, where possible, before major concerns arise; therefore, incidents of low-level abuse related to the characteristics of the below groups will be handled in line with early help procedures, which are laid out within the Child Protection and Safeguarding Policy. When responding to low-level incidents schools will analyse incidents over time to identify patterns, trends and locations requiring further intervention.

7.1 Girls

Staff will be aware that girls are more likely to be on the receiving end of child-on-child sexual abuse than their male counterparts, and that sexual violence and harassment against girls is very common and accounts for the majority of cases.

Taking into account that sexual harassment against girls is widespread in society, and largely based in gender inequality, the school will aim to encourage gender equality in all aspects of its operations. The school will aim to promote and nurture healthy attitudes and relationships amongst pupils of all genders, e.g. by challenging and working to deconstruct gender stereotypes in school.

Staff will challenge any incidents of misogynistic language or gender-based abuse, whether of a sexualised nature or not, as holding misogynistic viewpoints can make a pupil more likely to commit sexualised violence in the future.

7.2 LGBTQ+ pupils

Staff will be aware that pupils who are LGBTQ+, or are perceived to be LGBTQ+ whether they are or not, are more likely to be targeted by their peers, e.g. for discriminatory bullying.

The school will hold a zero-tolerance policy towards pupils using homophobic, biphobic or transphobic language, regardless of whether or not the language is being directed at another individual. Every staff member will be individually responsible for challenging such behaviour and making clear to all pupils that any abuse towards pupils who are LGBTQ+, or who are perceived to be, is unacceptable.

The school will ensure that it is able to provide a safe space for LGBTQ+ pupils to speak out and/or share their concerns with members of staff.

7.3 Pupils with SEND

Staff will be aware that pupils with SEND are at increased risk of child-on-child abuse, as they are three times more likely to be abused than their peers. The school will ensure that there are mechanisms in place to support pupils with SEND in reporting abuse, with due regard that these pupils may face additional barriers to reporting abuse and that spotting signs of abuse in these pupils may be harder.

Staff will avoid assuming that changes in the behaviour of pupils with SEND are as a result of their needs or disability, and will report any concerns to the DSL. The DSL and the SENCO will collaborate in the handling of instances of abuse towards pupils with SEND to ensure that barriers to communication can be effectively managed.

7.4 Black, Asian and other ethnic groups pupils

Staff will be aware that minority ethnic pupils, particularly black pupils, may be less likely to report abuse committed against them, and may be more likely to be misidentified as perpetrators of abuse.

The school will hold a zero-tolerance policy towards pupils using racist language, regardless of whether the language is being directed at another individual. Every staff member will be individually responsible for challenging such behaviour and making clear to all pupils that any abuse towards pupils from Black, Asian and other ethnic groups backgrounds is unacceptable.

Staff will also be aware that Black, Asian and other ethnic groups girls, pupils with SEND, or LGBTQ+, or perceived LGBTQ+ pupils, are likely to face increased abuse due to the intersection of these identities. Staff will be vigilant with regard to these pupils and the ways in which other pupils behave towards them, in order to ensure any incidents or potential incidents can be handled as soon as they occur.

8. Channels for Pupils to Report Abuse

Pupils will be able to report incidents of child-on-child abuse or concerns about the behaviour of their peers through the following channels:

- Speaking to class based staff or a trusted member of staff
- Disclosing to the DSL/DDSL in person.

Child Line

- Shore Space (The Lucy Faithfull Foundation's confidential chat service for young people concerned about sexual behaviours)

All channels for reporting abuse will be promoted and publicised throughout the school, and all pupils will be made aware of how, and to whom, to report incidents of abuse. The school will also ensure pupils are aware of the type of behaviour that should be reported. The message is that children can report *anything*, ranging from criminal behaviour, e.g. rape or sexual assault, to everyday harassment, e.g. sexualised jokes or inappropriate comments, to ensure that victims do not view their experience as 'not serious enough' to report.

The school will maintain a culture that promotes reporting abuse, whether the individual reporting is the victim, a bystander, or a friend or relative of the victim. Staff will address any incidents of pupils equating reporting abuse to 'snitching' or being a 'tattle-tale', and will convey to these pupils how important it is to report abuse to help tackle the wider problem of child-on-child abuse in schools.

9. Staff Identifying and Reporting Concerns

Staff will receive safeguarding training as part of their induction, and regular refresher training. This training will include guidance on how to recognise indicators of child-on-child abuse of all kinds, and how to distinguish between behaviour, particularly sexual behaviour, that is developmentally appropriate and that which is harmful.

When identifying pupils at risk of potential harm or who have been harmed by their peers, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem
- Changes to their social group, e.g. spending time with older pupils, or social isolation
- Alcohol or substance misuse.

Where a pupil is displaying signs of being impacted by child-on-child abuse, or perpetrating child-on-child abuse, staff will report this to the DSL as soon as is reasonably practical.

Staff will:

- Challenge all instances of abusive or harmful behaviour displayed by pupils that they witness or are reported to them. Staff will not wait for concerns or situations between pupils to escalate before intervening; minor or singular instances of abusive behaviour will still be brought to the attention of the DSL and the pupil will always be spoken to about their behaviour and disciplined, where appropriate, in line with the Behaviour Policy
- Enforce the school's policy that no known and substantiated incident of abusive or harmful behaviour between pupils will occur without consequences for the perpetrator(s), although these consequences will be decided on a case-by-case basis and will take into account the views of any victims involved, the context of the behaviour and the severity of the incident
- Be aware that just because a victim of abusive behaviour does not report the behaviour or react to the behaviour negatively, this does not mean that the behaviour is not still harmful; staff will be made aware that some pupils will be uncomfortable challenging their peers on inappropriate behaviour, or may not be aware themselves that the behaviour is abusive
- Ensure that both the perpetrator(s), or alleged perpetrator(s), and the victim(s) understand that such behaviour inflicted by or against them was unacceptable; staff will be made aware that failing to challenge a pupil on unacceptable behaviour can normalise that behaviour not just for the pupil in question, but for all pupils who see the behaviour going unchallenged
- Remain cognisant that downplaying abusive behaviour can lead to a culture of unacceptable behaviour throughout the school and, as such, will treat all displays or reports of abusive behaviour with the utmost severity and sensitivity in order to reinforce to all pupils that such behaviour will not be tolerated, and to prevent further instances of this behaviour in the future.

10. Handling Allegations of Abuse against Pupils

Staff will always, when handling an incident of alleged abuse, take the report of the victim seriously, reassure them, support them and work to keep them safe. Victims will never be made to feel like they are causing a problem by reporting **any** form of abuse, be made to feel ashamed, or have their experience minimised by staff at the school. Staff will be aware of the importance of not downplaying any reports of abuse; however, will ensure that they remain sympathetic, and observant of the duty of care, to both the alleged perpetrator(s) and victim(s).

If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it, or wait for a disclosure. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves, and the discussion will be handled sensitively and with the help of children's social care where necessary. If staff are in any doubt, they will speak to the DSL. All staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, and/or they may not recognise their experiences as harmful. This will not

prevent staff from having a professional curiosity and speaking to the DSL if they have any concerns.

Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same and the incident will be treated equally as seriously and investigated in the same way as an incident that took place in school.

All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage
- Only sharing the report with those necessary for its progression
- Explaining to the victim what the next steps will be and who the report will be passed to
- Recognising that the person the pupil chose to disclose the information to is in a position of trust
- Being clear about boundaries and how the report will be progressed
- Not asking leading questions and only prompting the pupil with open questions
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure; staff will ensure they remain engaged and not appear distracted
- Understanding that victims may not disclose the whole picture immediately and may be more comfortable providing information on a step-by-step basis
- Ensuring that dialogue is kept open and encouraged
- Only recording the facts as the pupil presents them – not the opinions of the note taker
- Where the report includes an online element, being aware of searching, screening and confiscation advice.
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy)
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.

The DSL will be informed of any allegations of abuse against pupils with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

10.1 Confidentiality

The school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school will not make this promise. The school will adhere to the principle that, even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm. The school recognises that effective information sharing between practitioners and local organisations is essential for early identification of need and effective safeguarding. Information will be shared in a timely and proportionate manner, in accordance with statutory guidance and data protection legislation.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk
- If a pupil is at risk of harm, is in immediate danger or has been harmed, a referral will be made to children's social care
- Rape, assault by penetration and sexual assault are crimes – reports containing any such crimes will be passed to the police.

The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

10.2 Anonymity

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school

will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved. When deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

10.3 Risk Assessment

The DSL or a deputy will make an immediate risk and needs assessment any time there is a report of sexual violence (See Appendix A). For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required. Risk assessments will consider:

- The victim
- The alleged perpetrator
- Other pupils at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded, either on paper or electronically, and kept under review in accordance with the school's Data Protection Policy.

10.4 Taking Action Following a Disclosure

The DSL or a Deputy DSL will decide the school's initial response, taking into consideration:

- The victim's wishes
- The nature of the incident
- The ages and developmental stages of the pupils involved
- Any power imbalance between the pupils
- Whether the incident is a one-off or part of a pattern
- Any ongoing risks
- Any related issues and the wider context, such as whether there are wider environmental factors in a pupil's life that threaten their safety and/or welfare
- The best interests of the pupil
- That sexual violence and sexual harassment are always unacceptable and will not be tolerated.

Immediate consideration will be given as to how to support the victim, alleged perpetrator and any other pupils involved.

For reports of rape and assault by penetration, the alleged perpetrator will be removed from any classes shared with the victim whilst the school establishes the facts. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator.

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately. In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Where a pupil is found to have been involved in harmful sexual behaviour, e.g. non-consensually sharing indecent imagery of another pupil, the school will help the pupil to move forward from the incident by supporting them in adopting more positive behaviour patterns and attitudes.

10.5 Managing the Report

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to children's social care or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing early help
- Referring to children's social care
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment are never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons behind decisions will be recorded promptly on the school's safeguarding recording system.

The following situations are statutorily clear and do not allow for contrary decisions:

- The age of consent is 16
- A child under the age of 13 can **never** consent to sexual activity
- Sexual intercourse without consent is **always** rape
- Rape, assault by penetration and sexual assault are defined in law
- Creating and sharing sexual photos and videos of children under 18 **is illegal** – including children making and sending images and videos of themselves.

10.6 Managing Internally

In some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

10.7 Providing Early Help

The school may decide that statutory interventions are not required, but that pupils may benefit from early help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing low-level, non-violent harmful sexual behaviour and may prevent the escalation of sexual violence. The school recognises that abusive behaviour can exist on a continuum and all concerns, including low-level incidents, will be recorded and reviewed to identify patterns of behaviour. The school will actively engage in local Early Help arrangements, including completing Early Help Assessments where appropriate, and contributing to multi-agency plans to support children and families. Staff will work with other professionals to prevent escalation of need.

10.8 Referral to Children's Social Care

If a pupil has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to children's social care. Parents will be informed unless there is a compelling reason not to do so, e.g. if the referral will place the victim at risk. This decision will be made in consultation with children's social care.

The school will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with children's social care to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions. If children's social care decides that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the pupil to be in immediate danger or at risk of harm. If the school agrees with the decision made by children's social care, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Where there are concerns about decisions made by other agencies, the school will use local escalation procedures to ensure that children needs are appropriately met.

10.9 Reporting to the police

Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to children's social care. The DSL and deputies will follow the local process for referral.

Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the pupil with any decision they take, in unison with children's social care and any appropriate specialist agencies.

The DSL and governing board will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity. The DSL will be aware of local arrangements and specialist units that investigate child abuse.

In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

10.10 Bail conditions

Pupils against whom further action is taken by the police may be released under bail conditions or 'released under investigation' (RUI) in circumstances that do not warrant the application of bail. Where this occurs and the perpetrator returns to school, the school's primary focus will be conducting an assessment of the risk the perpetrator poses to the victim or other pupils and staff at the school, both physically and in terms of trauma or emotional stress, and implementing any mitigating measures necessary to reduce the harm caused.

The school will work with children's social care and the police to support the victim, alleged perpetrator and other pupils, especially witnesses, during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities.

The school will liaise with police investigators to develop a balanced set of arrangements whereby both the alleged perpetrator and the victim can continue to receive a suitable education without compromising any ongoing investigations or the emotional state of the victim.

10.11 Managing delays in the criminal justice system

The school will not wait for the outcome, or even the start, of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made. The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

10.12 The end of the criminal process

Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable. The school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

Where an alleged perpetrator is found not guilty or a case is classed as requiring 'no further action', the school will offer support to the victim and alleged perpetrator for as long as is necessary. Staff will be aware that the victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support. The alleged perpetrator will also be offered ongoing support if needed, as they have also been through a difficult and upsetting experience.

The Headteacher will carefully consider, on a case-by-case basis, whether allowing the victim and the alleged perpetrator to share classes or attend the same activities is conducive to either party's effective education, and will implement alternative arrangements, in consultation with the DSL (and SENCO where the victim or alleged perpetrator has SEND), where necessary.

10.13 Ongoing support for the victim

Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the school uses to describe the victim

- The age and developmental stage of the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like.

Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a step-by-step basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Staff will be aware that victims may struggle in a normal classroom environment. Whilst the school will understand that it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. The school will ensure that this will only happen when the victim wants it to, not because it makes it easier to manage the situation. The school will provide a physical space for victims to withdraw to.

The school will be aware that victims may require support for a long period of time and will be prepared to offer long-term support in liaison with relevant agencies. The school will ensure that everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made. If the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered with the victim and following discussion with their parents. If the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.

10.14 Ongoing support for the alleged perpetrator

Any decisions made regarding the support required for an alleged perpetrator will be made with the following considerations in mind:

- The terminology the school uses to describe the alleged perpetrator
- The balance of safeguarding the victim and providing the alleged perpetrator with education and support
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary
- Their age and developmental stage
- What a proportionate response looks like
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials
- What the outcome of the investigation was.

When making a decision, advice will be taken from children's social care, specialist sexual violence services and the police as appropriate. If the alleged perpetrator moves to another school, for any reason, the DSL will inform the destination school of any ongoing support needs and transfer the child protection file.

If the reported abuse is found to have taken place, the school will work with professionals, as required, to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again. School will also review and consider any changes to school, policies, procedures or systems that could have prevented the incident (e.g. school case review).

10.15 Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing will not prevent the school reaching its own conclusion and imposing an appropriate penalty.

The school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and children's social care will be consulted where necessary. The school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

Disciplinary action and support can take place at the same time. The school will be clear whether action taken is disciplinary, supportive or both.

10.16 Shared classes

Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of pupils will always come first.

Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other pupils.

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator remains at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis. In all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

10.17 Working with parents

In most sexual violence cases, the school will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

The school will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Schools will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

10.18 Safeguarding other pupils

Pupils who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that pupils will "take sides" following a report, and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment.

The school will keep in mind that contact may be made between the victim and alleged perpetrator, and that harassment from friends of both parties could take place via social media, and will do everything in its power to prevent such activity.

As part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both the victim and alleged perpetrator. Schools will consider any additional support that can be put in place.

11. Monitoring and review

This policy will be reviewed annually by the Trust Safeguarding Lead.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The next scheduled review date for this policy is July 2027, or before if any changes to national or local policy or need.

12. Appendix A

Risk Assessment

Basic information	
Referrer Name and role	
Referrer Contact details (email address andphone number)	
Name of school for victim	
Name of school for child/ren alleged to have caused harm	
Did incident occur on school premises? If not, Where did the incident occur?	

CONSIDERATIONS	RISK (CONSIDER VICTIM, CHILD ALLEGED TO HAVE CAUSED HARM, OTHER PUPILS ANDSTAFF)	RISK LEVEL (HIGH, MEDIUM OR LOW)	ACTIONS TO REDUCE RISK	REVISEDRISK LEVEL (HIGH, MEDIUM OR LOW)
• What is the incident? • Who was involved? • Where did it happen				
Does this incident constitute a crime? Assault, sexual assault, rape, sharing of indecentimages of children, etc. As such has this been referred to the police?				
Is it necessary to limit contact between the children involved? Refer to KCSiE and DFE guidance on sexual harassment and sexual violence in schools and colleges.				
Is there an actual or perceived threat from the child alleged to have caused harm to the victim and/or others?				
Is either the victim or the child alleged to have caused harm at risk of physical harm as a resultof this incident (for example, bullying or 'retribution' by peers)?				

Do they share classes?				
Do they share break times? Do they share peer/friendship groups?				
Do they share transport to/from school?				
Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school?				
How can such contact be limited?				
Is there a risk of harm from social media and gossip?				

Further action taken by the school: Please complete for each child involved.

Child's name:

Action	YES/NO	Date
Police informed		
Referral to IFD		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		

Child's name:

Action	YES/NO	Date
Police informed		
Referral to IFD		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		