Child on Child Abuse Policy

Last Reviewed: September 2026

Next Review: September 2027

Implementation from: October 2026

Cycle: Annual

Version: 2.0

Tel: 01709 914070 | **Email:** admin@stfranciscmat.com | www.stfcmat.com
Registered Office: The Old Grammar School, 13 Moorgate Road, Rotherham, S60 2EN

Contents

Changes to this Edition 3

Statement of Intent 4

1.0 Legal Framework 6

3.0 Roles and responsibilities 8

4.0 Types of child-on-child abuse 12

5.0 A whole-school approach to tackling child-on-child abuse 17

6.0 Protecting pupils with increased vulnerability 21

7.0 Channels for pupils to report abuse 23

8.0 Staff identifying and reporting concerns 23

9.0 Handling allegations of abuse against pupils 26

10.0 Monitoring and review 36

Changes to this Edition

DATE	VERSION	DETAILS OF CHANGES
September 2025	1.0	First Edition – using National College template
September 2026	2.0	Policy updated across all sections to align with updated **DfE Keeping Children Safe in Education (KCSIE)** and **Working Together to Safeguard Children** statutory guidance:

Statement of Intent

St Francis CMAT is committed to safeguarding and promoting the welfare of every child. We recognise that child-on-child abuse can occur both inside and outside of school, including online, and will always be treated as a safeguarding concern rather than dismissed as banter, teasing, part of growing up or simply behaviour between children.

We are committed to creating a culture of respect, belonging and inclusion, where children feel safe, valued and listened to, and where all members of the school community understand that abuse is never acceptable. Through a whole-school preventative approach, we seek to identify concerns early, respond effectively and ensure that every child receives the support and protection they need.

This policy sets out a clear and consistent framework for preventing, identifying and responding to child-on-child abuse in line with current safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of respect, kindness, inclusion and belonging where all children feel safe, valued and confident that concerns will be taken seriously.
- Providing an age-appropriate curriculum that promotes respectful relationships, consent, online safety, equality, inclusion and positive behaviour, enabling children to recognise abuse and know how to seek help.
- Identifying children who may have experienced, witnessed or displayed harmful behaviours at the earliest opportunity and providing timely, appropriate and proportionate support.
- Ensuring that governors, leaders and all staff understand their safeguarding responsibilities, maintain an attitude of professional curiosity, recognise the signs and indicators of child-on-child abuse, and respond promptly and appropriately to all concerns.
- Ensuring that safeguarding policies, procedures and reporting systems are accessible, transparent and understood by staff, children and parents/carers, enabling concerns to be reported confidently and acted upon without delay.
- Promoting a safeguarding culture where children's voices are heard, their wishes and feelings are considered, and decisions are always made in their best interests.
- Working in partnership with parents, carers and external agencies to prevent abuse, safeguard children and promote positive relationships and wellbeing.

The DSL is **name of DSL**. In the absence of the DSL, child protection matters will be dealt with by **name of deputy DSL**.

1.0 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
- Victims and Prisoners Act 2024 (including Operation Encompass duties, where applicable)

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

- DfE *What to do if you're worried a child is being abused: Advice for practitioners*
- DfE (2024) 'Information sharing'
- Children's Social Care National Framework (latest edition)
- Department for Science, Innovation and Technology, and UK Council for Internet Safety (2024) 'Sharing nudes and semi-nudes: how to respond to an incident (overview)'
- Department for Science, Innovation and Technology, and UK Council for Internet Safety (2024) '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
- Sharing Nudes and Semi-Nudes (Youth-Produced Sexual Imagery) Policy

- Behaviour Policy
- Data Protection Policy
- Anti-bullying Policy
- Suspension and Exclusion Policy
- Online Safety Policy
- Staff Code of Conduct
- Personal Electronic Devices Policy
- Cyber-security Policy
- Children Missing from Education Policy
- Low-level Safeguarding Concerns Policy
- Relationships, Sex and Health Education (RSHE) Policy

The Child Protection and Safeguarding Policy is the Trust's overarching safeguarding policy. This Child-on-Child Abuse Policy should be read alongside that policy and forms part of the Trust's wider safeguarding arrangements.

2.0 Definitions

"Child-on-child abuse" is defined, for the purposes of this policy, as any form of abuse perpetrated by one child or group of children against another child or group of children. Child-on-child abuse can occur between children of any age and gender, both inside and outside of school, including online. It will always be treated as a safeguarding concern and never dismissed as banter, teasing, part of growing up or simply behaviour between children.

This policy covers child-on-child abuse both inside and outside of

"Harmful sexual behaviour (HSB)" refers to sexual behaviours demonstrated by children that are developmentally inappropriate, may be harmful to themselves or others, or are abusive. Harmful sexual behaviour exists on a continuum and should always be considered within the context of the child's age, stage of development and individual circumstances. Harmful sexual behaviour includes behaviour which:

- Occurs without freely given consent or fails to respect another person's rights, wishes or personal boundaries.
- Is inappropriate for the age or stage of development of the pupil.

- Is problematic, abusive or violent.
- May cause developmental damage.

Staff will recognise that harmful sexual behaviour may be influenced by a range of factors, including previous trauma, abuse, exposure to inappropriate sexual content, unmet needs, social influences or other safeguarding concerns. Responses will therefore be proportionate, child-centred and informed by professional judgement.

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 child or children who have experienced, or are alleged to have experienced, abuse.
- **Perpetrator(s)** the child or children who have displayed abusive or harmful behaviour towards another child.
- **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 term "alleged perpetrator" does not imply disbelief or minimise the seriousness of a report. All allegations of child-on-child abuse will be taken seriously, investigated appropriately and responded to in accordance with safeguarding procedures.

The Trust recognises that children displaying harmful behaviour may themselves have experienced abuse, trauma or other unmet needs. Safeguarding responses will therefore consider the welfare and support needs of all children involved whilst prioritising the safety, wellbeing and wishes of the child who has experienced harm.

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.

Child-on-child abuse exists on a continuum and may involve a single incident or a pattern of behaviour. Even if there are no reported incidents, child-on-child abuse may still be occurring. All concerns will therefore be taken seriously, explored with professional curiosity and responded to promptly.

3.0 Roles and responsibilities

The Trust and local academy committee has a duty to:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Promote a strong safeguarding culture across the Trust where child-on-child abuse is recognised, prevented and responded to effectively.
- 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.
- Ensure that safeguarding policies, procedures and training remain effective, child-centred and compliant with current legislation and statutory guidance.
- 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.
- Ensure that pupils receive an age-appropriate curriculum that promotes respectful relationships, consent, online safety, equality, inclusion and the prevention of child-on-child abuse.
- Ensure staff receive appropriate training to promote an inclusive school culture where all children feel safe, respected and valued, recognising that some children may experience additional vulnerability because of protected characteristics or other individual needs.
- 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.
- Ensure there are robust systems for responding promptly, fairly and proportionately to allegations of child-on-child abuse, while safeguarding the welfare of all children involved.
- Ensure behaviour systems promote safety, respect and accountability while recognising that child-on-child abuse is primarily a safeguarding issue rather than solely a behaviour matter.

- Ensure safeguarding arrangements reflect children's wishes, feelings and lived experiences, with decisions made in their best interests.
- 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 safety) 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 – this training should include, amongst other things, the expectations and responsibilities on staff in relation to filtering and monitoring, including understanding emerging safeguarding risks such as technology-facilitated **abuse, harmful sexual behaviour and AI-generated imagery.**

The headteacher has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Promote a whole-school culture of safeguarding, respect, inclusion and belonging where abuse is not tolerated and concerns are taken seriously.
- Ensure that the policies and procedures adopted by the local academy committee, 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 KCSIE, the Behaviour Policy, the Children Missing from Education Policy, online safety training, and the identity of the DSL and any deputies.
- Ensure all staff receive safeguarding induction, regular safeguarding updates and appropriate training to recognise, prevent and respond effectively to child-on-child abuse.
- Ensure safeguarding concerns are responded to promptly and that appropriate support is available for all children affected by child-on-child abuse.

The DSL has a duty to:

- Understand and keep up-to-date with local safeguarding arrangements.

- Lead safeguarding responses to allegations of child-on-child abuse, ensuring that all concerns are assessed promptly, proportionately and in accordance with safeguarding procedures.
- Ensure accurate safeguarding records are maintained and used to identify patterns, trends and emerging risks.
- Work collaboratively with Children's Social Care, the police and other agencies to coordinate support for children.
- 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.
- Provide advice, guidance and support to staff and coordinate appropriate safeguarding support for children who have experienced abuse and children displaying harmful behaviour.
- Lead the development of a preventative safeguarding culture through education, staff training, early identification and effective safeguarding practice.

All staff members have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Provide a safe environment in which pupils can learn.
- 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' and an ongoing sense of professional curiosity 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.
- Recognise that abuse may occur on a continuum, that children may minimise or normalise harmful behaviour, and that all concerns should be taken seriously.
- that technology is a significant factor in many safeguarding concerns, including child-on-child abuse, online grooming, coercion and AI-generated abuse.
- 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, recognising that safeguarding concerns must never be withheld because of confidentiality.
- 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.
- Keep timely, accurate and secure safeguarding records, ensuring concerns, decisions, actions and outcomes are clearly documented in accordance with the Child Protection and Safeguarding Policy.

All adults working within the Trust share responsibility for safeguarding children. No member of staff should assume that another colleague or agency has taken action. Where concerns remain, staff have a responsibility to escalate concerns in accordance with the Child Protection and Safeguarding Policy until they are satisfied that appropriate action has been taken.

4.0 Types of child-on-child abuse

Staff will understand that child-on-child abuse can take many forms, may involve a single incident or a pattern of behaviour, and can occur both inside and outside of school, including online. Different forms of abuse frequently overlap and should always be considered within the wider safeguarding context. Child-on-child abuse includes, but is not limited to:

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. Physical abuse may occur as an isolated incident or as part of wider patterns of coercive, controlling or discriminatory behaviour.

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 abuse between children may occur regardless of age, gender or sexual orientation and should never be dismissed as normal childhood behaviour or experimentation without careful professional consideration.

"Sexual violence" encompasses the definitions provided in the Sexual Offenses 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. Staff will always reassure children that reports of sexual violence will be taken seriously, recorded accurately and responded to promptly in accordance with safeguarding procedures.

"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.
- Sexualised rumours or unwanted discussion about another child's body or sexual activity.
- Sharing or threatening to share intimate images without consent.
- AI-generated sexual images ('deepfakes' or 'deep nudes').
- Sexualised comments based on gender stereotypes or misogynistic attitudes.
- Online sexual harassment, including:
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual threats or coercion.

The **"making or sharing of nude and semi-nude images or videos"** can also constitute sexual harassment – this refers to the creation, possession or sharing of nude and semi-nude images or videos between children, whether voluntary, pressured or coerced:

- 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 Sharing Nudes and Semi-Nudes (Youth-Produced Sexual Imagery) Policy and the Child Protection and Safeguarding Policy. This includes images that have been digitally altered or generated using artificial intelligence (AI).

Bullying

Bullying may involve repeated behaviour intended to hurt another person physically or emotionally. While many incidents are managed through the Behaviour and Anti-Bullying Policies, bullying that is abusive, discriminatory, sexually harmful or causes significant harm will be treated as a safeguarding concern.

Bullying is acted out through the following mediums:

- Verbally
- Physically
- Emotionally
- Online (cyberbullying)
- Prejudice-based 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.

Online abuse

Online abuse includes any form of abuse facilitated through digital technology, including social media, gaming platforms, messaging services, livestreaming and artificial intelligence. Online abuse may include bullying, sexual

harassment, coercion, threats, grooming, image sharing, exploitation, discrimination and other harmful behaviours.

Discriminatory behaviour

Discriminatory behaviour includes abuse, harassment or victimisation motivated by prejudice or hostility relating to a person's protected characteristics or perceived differences. This includes, but is not limited to, racism, sexism, misogyny, homophobia, biphobia, transphobia, disability discrimination, faith-based abuse and discrimination relating to special educational needs or disabilities. All cases will be handled in line with this policy and the Child Protection and Safeguarding Policy.

In accordance with the Equality Act 2010, the Trust will not tolerate discriminatory language, behaviour or attitudes in any form and will respond promptly through both safeguarding and behaviour processes where appropriate.

Abuse within intimate personal relationships

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.
- Monitoring another child's whereabouts or online activity.
- Controlling access to mobile phones, passwords or social media accounts.
- Threatening to share private images.
- Coercive or controlling behaviour.

All concerns relating to abuse within intimate personal relationships will be treated as safeguarding concerns. The school will provide appropriate support to all children involved and work with external agencies where necessary to reduce risk and promote safety.


ST FRANCIS
Deus Meus et Omnia

5.0 A whole-school approach to tackling child-on-child abuse

The Trust is committed to a whole-school approach to preventing, identifying and responding to child-on-child abuse. Creating a culture where children feel safe, respected, valued and able to speak up is everyone's responsibility. All members of the school community, including governors, leaders, staff, pupils, parents/carers and external partners, have a role in promoting a safe, inclusive and respectful environment.

The Trust Board and Local Academy Committee will ensure that safeguarding, including the prevention of child-on-child abuse, is embedded throughout the school's culture, policies, curriculum and daily practice. Procedures will be clear, accessible and understood by staff, pupils and parents/carers.

The school adopts a contextual safeguarding approach, recognising that abuse can occur in school, online and within the wider community. Safeguarding responses will therefore consider the wider contexts in which children live, learn and socialise when assessing risk and planning support.

Headteacher will ensure that all staff receive safeguarding induction, regular updates and appropriate training to recognise, prevent and respond effectively to child-on-child abuse.

School culture

The Trust will foster a culture of respect, kindness, inclusion and belonging where every child feels safe, valued and listened to. Child-on-child abuse, in any form, will never be accepted, ignored or minimised and will always be addressed with a clear and consistent safeguarding response.

The school will promote respectful interactions amongst pupils, and all staff will model appropriate and respectful behaviour. Staff will challenge language, attitudes and behaviours that minimise, excuse or normalise abuse. Expressions such as "boys will be boys", "it's just banter" or "they're only joking" will never be accepted as explanations for abusive behaviour.

The Trust recognises that wider societal influences, including misogyny, discrimination, prejudice, online culture and harmful stereotypes, can contribute to abusive behaviour. Preventative work will therefore promote equality, respect, healthy relationships and positive attitudes towards diversity while providing additional support for children who may be at increased vulnerability or risk. These principles will be reinforced through the school's values, behaviour expectations, curriculum, pastoral support and everyday interactions across the school community.

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.

Early help

All concerns relating to child-on-child abuse will be assessed promptly by the DSL or Deputy DSL. Decisions regarding early help, targeted support or referral to Children's Social Care will be made on a case-by-case basis, taking account of the nature of the incident, the needs of the children involved, previous concerns and any wider safeguarding risks.

The rationale for all safeguarding decisions will be clearly recorded, including the reasons for early help, referral, ongoing monitoring or no further action.

Early help will not delay or replace appropriate safeguarding referrals where a child is suffering, or is likely to suffer, significant harm.

The school will ensure that DSLs and deputy DSLs are suitably trained on the early help process and can access further support.

Early intervention will focus on reducing risk, strengthening protective factors and preventing concerns from escalating through coordinated support for children and families.

Curriculum

The Trust believes that high-quality relationships, health, sex and safeguarding education is one of the most effective ways to prevent child-on-child abuse. Through a carefully planned curriculum, pupils will develop the knowledge, skills and confidence to build healthy relationships, recognise abuse, respect others and seek help when needed. Creating this culture is the responsibility of all staff, who will reinforce these messages through everyday interactions and the wider curriculum.

In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the school will provide age-appropriate learning that enables children to recognise abuse, understand healthy relationships, challenge harmful attitudes and know how to report concerns.

The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. The school will also teach a planned programme of evidence-based RHE/RSHE, 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
- Digital citizenship
- Online influence and misinformation
- Misogyny and gender stereotypes
- Respectful online behaviour
- Image sharing and AI-generated images
- Bystander responsibility
- Trusted adults and help-seeking
- Appropriate use of social media and gaming platforms
- LGBTQ+ identities and relationships
- Body confidence and self-esteem
- The concepts of, the laws relating to, and how to access support for the following:
    - Sexual consent
    - Sexual exploitation
    - Abuse
    - Grooming
    - Coercion
    - Harassment
    - Rape
    - Domestic abuse
    - So called honour-based violence, e.g. forced marriage or FGM

- Online exploitation
- Image-based abuse
- Sharing nude and semi-nude images
- Technology-facilitated abuse

- What constitutes as sexual violence and sexual harassment and why these are always unacceptable

Pupils will be encouraged to speak openly about worries or concerns and will be taught how to seek help for themselves or others. They will understand that all reports will be listened to, taken seriously and responded to appropriately.

Teaching about consent, boundaries and respectful relationships will begin in an age-appropriate way from the earliest years and develop progressively as pupils mature, ensuring that learning remains inclusive, developmentally appropriate and responsive to emerging safeguarding risks.

The Trust recognises that creating a culture of safety requires more than responding to incidents. Through positive relationships, inclusive practice, effective safeguarding education and early intervention, we aim to prevent child-on-child abuse from occurring, ensuring that every child feels safe, respected, valued and able to thrive.

6.0 Protecting pupils with increased vulnerability

The Trust recognises that child-on-child abuse can affect any child. However, some children may experience additional vulnerability because of their individual circumstances, lived experiences or protected characteristics. These factors will be considered when assessing risk, planning support and responding to safeguarding concerns.

Staff will avoid making assumptions about children based on their identity or circumstances. Instead, safeguarding responses will be informed by professional curiosity, the child's voice and an understanding of each child's individual needs. Staff will also recognise that children displaying harmful behaviour may themselves be vulnerable and require safeguarding support.

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 and the Low-level Safeguarding Concerns Policy.

When assessing vulnerability, staff will consider the cumulative impact of multiple risk factors, recognising that some children may face intersecting vulnerabilities that increase the likelihood of experiencing abuse or barriers to disclosure.

Girls

Staff will recognise that national evidence demonstrates that girls are disproportionately affected by sexual violence, sexual harassment and image-based abuse. These behaviours will never be normalised or minimised.

The Trust will actively promote equality, respect and healthy relationships, challenging sexism, misogyny and harmful gender stereotypes through the curriculum, behaviour expectations and everyday interactions.

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.

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 clear and consistent response towards pupils using homophobic, biphobic or transphobic language, regardless of whether or not the language is being directed at another individual. All staff are responsible for challenging discriminatory language and behaviour, reinforcing that prejudice-based abuse is unacceptable and responding appropriately to safeguarding concerns.

The Trust will foster an inclusive environment where all children feel safe to express concerns and access support from trusted adults.

Pupils with SEND

Staff will recognise that children with SEND may experience increased vulnerability because they can face additional barriers to recognising abuse, communicating concerns or being believed. Safeguarding responses will therefore be adapted to meet individual communication, learning and sensory needs.

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.

Children from Black, Asian and minority ethnic backgrounds

Staff will recognise that children from Black, Asian and minority ethnic backgrounds may experience racism, discrimination or cultural barriers that can affect both their experiences of abuse and their willingness to report concerns. Safeguarding responses will be culturally sensitive, child-centred and free from bias.

The Trust will challenge all forms of racist language, behaviour and discrimination promptly and consistently. Every staff member will be individually responsible for challenging such behaviour and making clear to all pupils that any abuse towards pupils from BAME backgrounds is unacceptable.

Staff will recognise that some children may experience multiple or intersecting vulnerabilities because of their identity, culture, disability, gender or other individual circumstances. Safeguarding assessments will always consider the child's unique lived experience rather than making assumptions based on any single characteristic.

Children with social care involvement and other vulnerabilities

Staff will recognise that children with social care involvement, children who have experienced trauma or adverse childhood experiences, young carers, children who are persistently absent, children who are missing education, children living with domestic abuse, and children experiencing poor mental health may face increased vulnerability to child-on-child abuse. These children may require additional support, monitoring and early intervention to reduce risk and promote safety.

7.0 Channels for pupils to report abuse

The Trust is committed to creating a culture where children feel safe, listened to and confident that any concern they raise will be taken seriously. Pupils will be encouraged to report abuse affecting themselves or others, knowing that they will be listened to, supported and treated with dignity and respect.

- Speaking to any trusted member of staff.
- Speaking directly to the DSL or Deputy DSL.
- Speaking to their class teacher or tutor.
- Speaking to another pastoral member of staff.
- Using the school's safeguarding or worry reporting system.
- Using the school's confidential email or online reporting system (where available).
- Speaking to a trusted adult during break, lunchtime or before/after school.
- Asking a parent/carer or another trusted adult to report concerns on their behalf.

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, 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.

8.0 Staff identifying and reporting concerns

All staff will receive safeguarding induction, regular safeguarding updates and ongoing training appropriate to their role. This will include recognising the signs of child-on-child abuse, understanding harmful sexual behaviour, technology-facilitated abuse and responding appropriately to disclosures and concerns.

Staff will recognise that child-on-child abuse may present through physical, emotional, behavioural or social indicators, and that no single sign should be considered in isolation. Professional curiosity and effective information sharing are essential.

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
- Sudden changes in attendance.
- Anxiety about attending school.
- Avoiding particular pupils or places.
- Reluctance to use phones or social media.
- Self-harm or suicidal thoughts.
- Emotional dysregulation.
- Changes in friendship groups.
- Significant changes in behaviour or presentation.
- Persistent absence.
- Declining engagement in learning.

Any member of staff who has a concern, receives a disclosure or witnesses abusive behaviour must report this to the DSL (or Deputy DSL) immediately, in accordance with the Child Protection and Safeguarding Policy. Staff should never assume that another adult has taken action.

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.

Staff will enforce the school's policy that Where abusive behaviour is substantiated, appropriate action will always be taken to safeguard children, reduce future risk and address the behaviour. Responses will be proportionate, educational where appropriate and informed by the individual circumstances of the children involved.

Staff will 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.

Staff will ensure that all children involved understand why the behaviour was unacceptable and that appropriate support is provided to both the child who experienced harm and the child displaying harmful behaviour.

Staff will never minimise, dismiss or normalise reports of child-on-child abuse. Every concern will be responded to with sensitivity, professionalism and an understanding that even seemingly low-level incidents may form part of a wider safeguarding pattern.

9.0 Handling allegations of abuse against pupils

All reports of child-on-child abuse will be taken seriously. The immediate priorities will be to ensure the safety and wellbeing of the child who has experienced harm, provide appropriate support, establish the facts and assess ongoing risk. Staff will respond calmly, sensitively and without judgement, ensuring that no child is made to feel blamed, ashamed or responsible for reporting abuse.

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.

The Trust recognises that child-on-child abuse frequently occurs beyond the school gates, including online. Incidents involving pupils from the school will therefore be assessed and responded to regardless of where they occur when there is a safeguarding concern.

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.
- Listening carefully without expressing shock, disbelief or judgement.
- Providing reassurance that the child has done the right thing by speaking up.
- Making clear that support will be provided throughout the safeguarding process.

Where concerns involve a child with SEND, the DSL will work closely with the SENCO and other relevant professionals to ensure safeguarding responses take account of the child's communication needs, developmental stage, understanding and any reasonable adjustments required.

Following every incident of child-on-child abuse, the DSL will consider whether there are wider patterns, contextual safeguarding concerns or emerging risks within the school community. Learning from incidents will be used to inform future safeguarding practice, curriculum development, staff training and preventative work.

Confidentiality

Information will only be shared with those who need to know in order to safeguard children, fulfil statutory duties or support any investigation. Children will never be promised complete confidentiality, as staff have a legal and professional responsibility to share information where this is necessary to protect a child or others from harm. Information sharing will always be lawful, proportionate and in the best interests of the child.

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

Where appropriate, the wishes and feelings of the child will be considered when making information-sharing decisions; however, these will always be balanced against the Trust's duty to safeguard children

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.

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.

Staff will actively discourage speculation, rumours and the sharing of information through social media or other communication platforms that could identify or further harm children involved.

Risk assessment

The DSL (or Deputy DSL) will complete an immediate safeguarding risk and needs assessment following any report of sexual violence and, where appropriate, reports of sexual harassment or other serious child-on-child abuse. Risk assessments will be dynamic documents that are reviewed regularly as circumstances change.

Risk and needs assessments will consider:

- The victim, especially their protection and support.
- Whether there may have been other victims.
- The alleged perpetrator.
- Other pupils at the school, especially any actions that are appropriate to protect them.
- The time and location of the incident, and any action required to make the location safer.
- Communication needs.
- SEND or additional vulnerabilities.
- Mental health and emotional wellbeing.
- Online risk.
- Wider contextual safeguarding concerns.

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

Taking action following a disclosure

Every report will be considered individually, with decisions informed by professional judgement, statutory guidance, the child's wishes and feelings, and the need to safeguard all children involved.

- 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.
- Whether there are any patterns, repeated behaviours or wider safeguarding concerns across the school community.
- 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.

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.

Regardless of the outcome, the Trust will continue to monitor the wellbeing of all children involved and review support arrangements regularly to ensure risks are reduced and appropriate safeguarding measures remain in place.

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 either on paper or electronically.

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

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.

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 non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.

All staff will be aware of their local early help process and understand their role in it.

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.

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, Headteacher and local academy committee 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.

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.

The Trust will ensure that educational arrangements continue to promote safety, inclusion and continuity of learning for all children involved wherever possible.

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.

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.

Ongoing support for the victim

Support for the child who has experienced harm will be individualised, regularly reviewed and informed by the child's wishes, feelings, safety and educational needs:

- 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
- Where appropriate, support plans will be developed in partnership with parents/carers and external agencies.

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 at the request of 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.

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.

Where appropriate, interventions will seek to understand the underlying causes of the behaviour, reduce future risk and promote positive behavioural change while maintaining appropriate safeguarding arrangements.

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.

Safeguarding support and disciplinary action are not mutually exclusive and may take place simultaneously where appropriate.

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.

Decisions will be reviewed regularly and adapted if risks or circumstances change.

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.

The Trust recognises that there may be occasions where informing parents immediately could increase risk to a child. In such circumstances, decisions will be made in consultation with Children's Social Care and/or the police.

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.

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.

10.0 Monitoring and review

This policy will be reviewed annually by the Trust Board or sooner if there are changes to legislation, statutory guidance or local safeguarding arrangements.

The effectiveness of this policy will be monitored through safeguarding quality assurance activities, safeguarding audits, case reviews, staff training, pupil voice and feedback from external agencies where appropriate. Learning from incidents will be used to continually strengthen safeguarding practice across the Trust.

All staff will receive this policy as part of safeguarding induction and regular safeguarding updates and will be expected to understand and implement the procedures it contains.

The next scheduled review date for this policy is **September 2027.**