Child on Child Abuse Policy

***Please note**: This is an addendum to and must be read in conjunction with the CCLT Child Protection and Safeguarding Policy 2026-27.*

Introduction

Keeping Children Safe in Education 2026 states that governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be updated regularly. Furthermore, where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The school or college's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report, any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

All staff should recognise that children are capable of abusing other children (including online). All staff should be clear about their school or college's policy and procedures with regard to child-on-child abuse.

All staff should understand that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding child-on-child abuse they should speak to their Designated Safeguarding Lead (or deputy).

This means that ALL staff will take a 'zero-tolerance' approach to any unacceptable behaviour, and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children. Staff will seek to prevent, challenge and take action so that all children understand that any concerns regarding their welfare and safety will be taken seriously. This will encourage and promote a culture of acceptable behaviour and a safe educational environment for all children.

We recognise that for some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

All staff must ensure that they reassure any victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should they ever be made to feel ashamed for making a report.

As defined within Keeping Children Safe in Education 2026, child-on-child abuse can take of different forms, such as:

- **Harmful Sexual Behaviour (HSB):** Sexual violence and sexual harassment, which the guidance explicitly links to the escalatory nature of misogyny, sexism, and online content (such as deepfakes or AI-generated sexual imagery).

- **Physical Violence and Threats:** Physical assaults and harm, or the threat of harm with a weapon.
- **Physical Abuse:** Hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- **Bullying and Cyberbullying**: Including prejudice-based and discriminatory bullying targeting race, faith, disability, sexual orientation, or gender.
- **Upskirting:** An illegal act which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and initiation/hazing type violence and rituals.
- **Sharing Non-Consensual Intimate Images (NCI):** Sharing, threatening to share, or creating digital or AI-manipulated sexual images of peers. The department provides Searching Screening and Confiscation Advice for schools. The UKCIS Education Group has published Sharing nudes and semi-nudes: advice for education settings working with children and young people which outlines how to respond to an incident
- **Forced sexual activity**: causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

At Redbrook Hayes Primary School we are committed to the prevention, early identification and appropriate management of child-on-child abuse. In particular, ensuring that our school staff protect our children by, wherever possible being aware of the nature and level of risk that children are exposed to, having a clear and comprehensive strategy specific to that child's safeguarding context and having a whole school safeguarding approach to preventing and responding to child-on-child abuse. This policy is preventative in its response to child-on-child abuse by raising awareness of issues, supporting staff in identifying them with children, and providing appropriate response and intervention that is followed consistently across the whole school workforce. This policy will also encourage parents to share information about any risk of harm to their child and be clear on the school's expectations of how this will be managed.

All staff and Governors understand and agree to work within this policy framework, and parents have access to this policy.

This policy will be updated annually.

Purpose and Aim

'Research from Farrer and Co has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by other children, parents or adults in the community, prior to their abuse of another child/other children' (Farrer and Co, 2024).

Children and young people may be harmful to one another in a number of ways which would be classified as child-on-child abuse. The purpose of this policy is to explore the many forms of child-on-child abuse and include a planned and supportive response to the issues.

At Redbrook Hayes Primary School we have the following policies in place that should be read in conjunction with this policy:

- CCLT Child Protection and Safeguarding Policy
- Anti-Bullying Policy
- Behaviour Policy
- CCLT Online Safety Policy

- CCLT Relationship & Sex Education Policy
- Attendance Policy

Framework and Legislation

A child-centred approach is fundamental to safeguarding and promoting the welfare of every child. All practitioners should follow the principles of the Children Act 1989 and 2004. These Acts make clear that the welfare of children is paramount and this policy is supported by this key principle.

Another key document that focuses adult thinking towards the views of the child is Working Together 2026, highlighting that, "Anyone working with children should see and speak to the child, listen to what they say, observe their behaviour, take their views seriously, and work with them and their families and the people who know them well when deciding how to support their needs." (Working Together to Safeguard Children, 2026). This is clearly echoed by Keeping Children Safe in Education 2026 through ensuring procedures are in place in schools/colleges and settings to hear the voice of the child and to be mindful of the contexts the children live in.

At Redbrook Hayes Primary School we are committed to the following described preventative strategies to protect and support children from child-on-child abuse.

Preventative Strategies for Schools and Settings

Recognition

At Redbrook Hayes Primary School we have appropriate strategies in place in order to prevent the issue of child-on-child abuse rather than responding reactively.

At Redbrook Hayes Primary School we recognise that child-on-child abuse can and will occur on any site even with the most stringent of policies and support mechanisms and that even if incidents are not being reported it does not mean that they are not happening. In which case it is important to continue to recognise and manage such risks and learn how to improve and move forward with strategies in supporting children to talk about any issues and through sharing information with all staff. This involves staff analysing any incidents for trends, patterns and identifying any areas around the site that may appear to be 'less safe'. Staff will also have access to regular CPD and training to ensure a consistent approach to managing child-on-child issues. All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. (KCSIE, 2026).

School Culture and Ethos and 'Zero-Tolerance' Approach

In Redbrook Hayes Primary School we take a 'zero-tolerance' approach to abuse, harm or bullying between children and this is clearly expressed in our school's ethos and values and will be shared with all school partners including children, parents and carers. It will be made clear that sexual violence and sexual harassment is never acceptable and it will not be tolerated and never passed off as 'banter', 'just having a laugh', 'a part of growing up' or 'boys being boys', as failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Therefore, in school, we recognise, acknowledge and understand the scale of harassment and abuse.
This means that all staff will challenge any form of behaviour both on or offline, from language and comments to physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. All staff will also ensure that any information is shared directly with the Designated

Safeguarding Lead (or Deputies) and recorded factually and accurately as soon as possible so that any action required to prevent further incidents occurs immediately.

Therefore, a whole school approach is needed as part of preventative education (Keeping Children Safe in Education 2026).

A Safe Environment to Share Concerns Alongside a Positive Curriculum

As stated above, it is therefore important that each school/setting has an open environment where young people feel safe to share information about anything that is upsetting or worrying them. This can be strengthened through a strong and positive PSHE/SMSC/RSHE curriculum that tackles such issues as prejudiced-based and discriminatory behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. The curriculum will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse and children with special educational needs or disabilities.

All staff are made aware that children may not feel ready, or know how, to tell someone that they are being abused, exploited, or neglected and they may not recognise their experiences as harmful. E.g., children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent staff from having professional curiosity and speaking to the DSL (or Deputy) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Therefore, to enable such an open and honest environment it is necessary to ensure that Governing Bodies or Proprietors feel confident that the whole workforce is supported and enabled to talk about issues and challenge perceptions of children including use of inappropriate language and behaviour towards one another. In order to create such an environment, it is necessary for whole staff training and CPD around abusive behaviours and talking to children in a way that continues to create an open and honest environment without prejudice. This is in line with school's legal obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty) and local multi-agency safeguarding arrangements.

It is necessary that staff consider each issue and each individual in their own right before taking action. If staff minimise the concerns raised it may result in a child seeking no further help or advice. Systems are in place and they are well promoted, easily understood and easily accessible for children to confidently report, any form of abuse, exploitation or neglect, knowing their concerns will be treated seriously, and knowing they can express their views and give feedback. Staff will be enabled to discuss issues about online access and support and reinforce appropriate behaviours online including understanding why age limits are in place on social media platforms, encouraging children to share online concerns, talking about issues that have happened in an open forum and working closely with parents. All staff are aware that technology is a significant component in many safeguarding and well-being issues. Children are at risk of abuse online as well as face to face. In many cases abuse 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. (KCSIE, 2026)

At Redbrook Hayes Primary School we have a clear Learner Acceptable Use Policy that gives clarity and expectations to children about their role in keeping themselves and other children safe in regard to the use of technology both inside and outside of school.

Involve Parents

Parents need to be informed and included in policy forming, lesson plans and thorough open and frank conversations, training/courses about what child-on-child abuse is and how the school will be tackling it. This can help to alleviate any concerns and worries and create a joined-up approach supporting parents in how to approach conversations with children with the same consistency as school. At Redbrook Hayes Primary School we ensure open two-way communication is available through a variety of platforms so that both parents and staff are working together to deal with any issues.

Signposting

Although every effort should be made for children to have a variety of opportunities to seek support and advice, it is also important that signposting is available to young people in the event that they don't feel confident raising an issue directly to staff or a peer. In the same way external services or support programmes could be brought in to talk to young people about specific issues in support of the prevention of child-on-child abuse. This then encourages a variety of forms or mediums for children to have their voices heard.

Forums for Children to Make Changes/Have Their Voice Heard

It is useful to ensure young people are part of changing their circumstances and that of the procedures within schools. Having a school council and pupil voice and encouraging young people to support changes and develop 'rules of acceptable behaviour' will go far in helping to create a positive ethos in school and one where all young people understand the boundaries of behaviour before it becomes abusive. Children should be able to effectively communicate how to improve their school's culture and ethos around acceptable behaviour so that children can feel confident and empowered to identify unacceptable behaviours so that they can be dealt with accordingly and in the longer term eradicated.

Partnership Working

Multi agency working can consolidate in house procedures in schools/settings. By accessing advice, support and guidance, effective decisions can be made in collaboration to improve outcomes for children who may be at risk of harm. Seeking advice and guidance can act as a preventative measure so that the right course of action is taken at the earliest opportunity. It is also necessary that the school actively refers concerns/allegations of child-on-child abuse where necessary to Local Authority children's social care and the police where appropriate. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working. Schools which excel at tackling bullying (child-on-child abuse) have created an ethos of good behaviour where pupils treat one another and the school staff with respect because they know that this is the right way to behave. That culture extends beyond the classroom to the corridors, the dining hall, the playground, and beyond the school gates including travel to and from school. Values of respect for staff and other pupils, an understanding of the value of education, and a clear understanding of how our actions affect others permeate the whole school environment and are reinforced by staff and older pupils who set a good example to the rest. (Preventing and Tackling Bullying, 2017).

Child-on-Child Abuse Explained Further

For these purposes, child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate), friendships and wider peer associations. Child-on-child abuse can take various forms, including: bullying (including cyber-bullying, prejudice-based and discriminatory bullying), intimate personal relationships between children (also known as teenage relationship abuse), physical abuse, sexual violence, sexual harassment, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos,

causing someone to engage in sexual activity without consent, upskirting and initiation/hazing type violence and rituals (KCSIE, 2026). It may also involve gang related behaviours, including serious violence and county lines. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's lived experiences. This can be done by adopting a Contextual Safeguarding approach and by ensuring that school's response to alleged incidents of child-on-child abuse takes into account any potential complexity.

Abusive behaviour can happen to pupils in schools and settings, and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm. This means adopting a whole school community approach by ensuring all staff: are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments (KCSIE, 2026), understand how a child's wider context may have impact on them; contribute to creating a strong safeguarding culture in school by following policies that address child-on-child abuse and harmful attitudes; promoting positive and healthy relationships and attitudes to difference (including gender, ethnicity sexuality and disability), hotspot mapping to identify risky areas in school, training on potential bias and stereotyped assumptions; being alert to and monitoring changes in children's behaviour and/or attendance, challenging poor threshold decisions about children at risk of harm in extra-familial settings as well as referring concerns about contexts to relevant local agencies. Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Research suggests that child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. It is more likely that girls will be victims and boys perpetrators, but all child-on-child abuse must be taken seriously (KCSIE, 2026). Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of child-on-child abuse within their settings and recognise that these will play out differently in single sex, mixed or gender imbalanced environments.

It is critical to be aware of the role that inequality and discrimination can play in child-on-child abuse. Socio-economic inequality within a school or college can increase bullying, and racial and ethnic minority status can be a risk factor for victimisation by peers. Children from minoritised groups are at much higher risk for poor health and behavioural outcomes as a result of discriminatory bullying. LGBTQ+ children may also be at greater risk of abusive behaviour from their peers. It is important to consider the forms abuse may take and the subsequent actions required.

Children with Special Educational Needs

Children with special educational needs or disabilities (SEND), or certain health conditions, can face additional safeguarding challenges which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury may relate to the child's disability without further exploration;
- possibly being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To address these possible additional challenges staff would always consider additional ways, including pastoral support, to help all children, including those with SEND or certain medical conditions, involved in forms of child-on-child abuse. Close liaison with the designated safeguarding lead (or a deputy) and the SENCO is required with any reports of abuse involving children with SEND

Children Who Are lesbian, lay, bisexual or gender questioning

Children who are lesbian, gay or bisexual can be targeted by other children and risks can be compounded where children lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Intersectionality

Intersectionality is the recognition that people's experiences are shaped by their multi-layered identities. A person's interactions with the world are shaped by their ethnicity, age, gender, sexuality, class and abilities, and these aspects of a person's identity interrelate. Someone may experience racism, sexism and ageism collectively or individually at different times and in different environments. The effect of a child's experiences may influence whether he/she is comfortable accessing support if they are a victim of child-on-child abuse.

Adultification

This is a form of racial prejudice in which children from minoritised groups are treated as more mature than they actually are by a reasonable social standard of development. This may lead to failure to recognise victims of child-on-child abuse and to respond appropriately to the experiences of children from minoritised ethnic groups. Whilst adultification can impact all children in certain ways it is important that there is an acknowledgement that it specifically affects Black children.

At Redbrook Hayes Primary School the specific needs of all our children will be considered and supported in all incidents.

Language

For the purposes of this policy the language used will refer to 'victims'. It is a widely recognised term; however all children may not recognise themselves as a victim or want to be described in this way. The term alleged perpetrators will also be used, this is to ensure that children are not given 'labels' about their behaviour unfairly and without any full and thorough conclusive investigation and because they themselves found the abusive behaviour harmful or may have been a victim of previous harm.
The language used is to support victims so that they understand that they will always be believed, supported, listened to and taken seriously. The language used to children and parents in the reporting of any incidents that may have occurred could impact on any future rehabilitation of children following any investigations that may occur. The use of certain words can be both inflammatory and distressing for children and their parents, so care will be taken in the discussion of incidents with parents to ensure they are factual and accurate.

Types of Abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken.

Bullying (including Cyberbullying, Prejudice-Based and Discriminatory Bullying)

The new definition of bullying is, 'a person who habitually seeks to harm or intimidate those who they perceive as vulnerable'. (Taken from the Oxford, Cambridge and Collins dictionary, updated 2018).

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour. (Preventing and Tackling Bullying, July 2017)

Online/Cyber Bullying

Online/Cyber bullying is the use of phones; instant messaging, e-mail, chat rooms or social networking sites such as Instagram or X to harass threaten or intimidate someone for the same reasons as stated above.

Many children have unlimited and unrestricted access to the internet via mobile phone networks. This means that some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images; consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour.
If the behaviour involves the use of taking or distributing sexual images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the school will have no choice but to involve the police to investigate these situations.

Prejudiced-Based and Discriminatory Bullying (including hate incidents and hate crimes which may also include an online element)

The term prejudice-based and discriminatory bullying refers to a range of hurtful behaviour, physical or emotional or both and online, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual). This can also be described as a hate incident or crime.

Abuse in Intimate Personal Relationships Between Children (Teenage Relationship Abuse)

Abuse in intimate personal relationships between peers is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abuser uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidently before considering the action or punishment to be undertaken.

Racism

Racism occurs when a person is treated less favourably because of their skin colour, nationality, ethnicity, or cultural group. Racist behaviour can include verbal abuse, physical attacks, exclusion from activities or opportunities and microaggressions, which can be conscious and unconscious. It can occur in person or online.

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 idea behind this practice is that it 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. It can include activities involving harassment, abuse, or humiliation used as a way of initiating a person into a group and may also include and online element.

Sexual Violence

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:
Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual. B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration

with conditions such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

• A child under the age of 13 can never consent to any sexual activity
• The age of consent is 16
• Sexual intercourse without consent is rape

Sexual Harassment

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. In referencing sexual harassment, it is in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:
• Sexual comments, such as; telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
• Sexual 'jokes' or taunting;
• Physical behaviour, such as; deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
• Displaying pictures, photos or drawings of a sexual nature
• Upskirting (this is a criminal offence)
• Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
It may include:
• Consensual and non-consensual sharing of nude and semi-nude images and videos;
• Sharing of unwanted explicit content
• Sexualised online bullying;
• Unwanted sexual comments and messages, including, on social media;
• Sexual exploitation; coercion and threats and;
• Coercing others into sharing images of themselves or, performing acts they're not comfortable with online.

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and college. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Safeguarding incidents and/or behaviours can be associated by factors outside the school, including intimate personal relationships. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Staff should be aware that is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys (KCSIE, 2024).

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Online Sexual Harassment including Consensual and Non-Consensual Sharing of Nudes and Semi-Nudes Images and/or Videos

This is also known as sexting or youth produced sexual imagery. 'Youth Involved/Produced' includes children sharing images that they, or another child, have created themselves.

'Imagery' covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy).

Sexting (more commonly known as) is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can occur in any relationship, to anyone, whatever their age, gender or sexual preference.
However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, children are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. The umbrella term is 'harmful sexual behaviour' (HSB). Harmful Sexual Behaviour can occur online and/or face to face and can also occur simultaneously between the two.

When considering Harmful Sexual Behaviour, ages and stages of development of children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, e.g., the child is disabled, or smaller in stature.
Harmful sexual behaviour from children is not always contrived or with the intent to harm others. There may be many reasons why a child engages in harmful sexual behaviour and it may be just as distressing to the child who instigates it as well as the child it is intended towards. Harmful sexual behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another, sexual assault, rape or abuse.

Measuring the behaviour

Simon Hackett's continuum of behaviour (taken from Farrer and Co. 2024) can be a useful guide to measure the behaviour that has occurred and consider the circumstances around the incident (s).

The continuum looks at whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability

• involves an element of coercion or pre-planning
• involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
• involves a misuse of power

Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies.

Expected Action from all Staff

All staff should be alert to the wellbeing of children and young people and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

Although the type of abuse may have a varying effect on the victim and alleged perpetrator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

Firstly, all staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. It is important for all staff to deal with a situation of child-on-child abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true, accurate account of the facts around what has happened, so that nothing is forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word 'perpetrator', this can quickly create a 'blame' culture and leave a child labelled.

In all cases of child-on-child abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.
Staff will also be mindful that wider safeguarding concerns may influence the child's account of the event(s). Alongside this peer pressure and the impact of sharing information about the incident(s) may also influence a child's account.

Gather the Facts

In cases specifically relating to sexual violence and sexual harassment, two members of staff (preferably one being the Designated Safeguarding Lead) should be present to manage the report, where possible. Staff should not view or forward illegal images of a child and instead confiscate any devices to preserve any evidence and hand them to police for inspection. All staff should be aware of the requirement for children to have an Appropriate Adult (PACE Code C 2023) particularly when multi agency partners such as Local Authority Children's Social Care or the Police have to interview the child.

The most appropriate member of staff with the best relationship with the child should be the person alongside the child who wishes to disclose wherever possible. However, staff should always be aware that children may choose to disclose to any member of staff that they feel most comfortable with and therefore all staff need basic training in managing disclosures. In any circumstance the member of staff must make clear to the child that they cannot maintain confidentiality if what is being shared has put or will put the child or another person at risk of harm and/or is criminal. Staff must also be aware that an initial disclosure

to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

In all circumstances, staff need to speak to all the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. This involves listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed and not asking leading questions. This means only interrupting the young person to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?) Then, a full and clear record of exactly what the young person has said in their own language should be made (and no individual interpretation of the facts made which could impact on the disclosure) after the child has finished the disclosure, so the child feels listened to and stored following each school/setting's own recording protocols (paper or electronic systems).

Consider the Intent (begin to Risk Assess)
Has this been a deliberate or contrived situation for a young person to be able to harm another?

Decide on your next course of action
If from the information that you gather you believe any young person to be at risk of significant harm you must make a safeguarding referral to Local Authority Children's Social Care immediately (where a crime has been committed the police should be involved also). If this is the case, once social care has been contacted and made a decision on what will happen next then you will be informed on your next steps.
If Local Authority Children's Social Care and the police intend to pursue this further they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also. It is important to be prepared for every situation and the potential time it may take.
It may also be that Local Authority Children's Social Care feel that it does not meet their criteria in which case school may challenge that decision, with that individual or their line manager. If on discussion however, you agree with the decision, you may then be left to inform parents.

Confidentiality and Anonymity
Any staff member taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. Ultimately, the Designated Safeguarding Lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

Informing parents
If, once appropriate advice has been sought from police/Local Authority children's social care school have agreement to inform parents, or have been allocated that role from the other services involved, then you need to inform the parents as soon as possible. If services are not going to be involved then equally, this information may need to be shared with parents. Parents would not be informed if by doing so the child was put at further risk of significant harm.

In all circumstances where the risk of harm to the child is evident then the school should encourage the young person to share the information with their parent or even with them (they may be scared to tell parents that they are being harmed in any way). Where school can evidence they are acting in the best interests of the young person they would not be criticised, however this would be the case if they actively breached the rights and choices of the child.

The best way to inform parents is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a child may be suffering can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

Points to Consider (Risk Assessment):

The wishes and feelings of the victim
It is important to understand how the victim wants to proceed to allow as much control as is reasonably possible over the decisions regarding how any investigation will be progressed.

The Nature of the Alleged Incident
This includes consideration as to whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.

What is the age and development of the children involved?
How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however should not be overlooked if other issues arise (see following). Any imbalance of power and control must be considered.

Are There Any Additional Vulnerabilities?
Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers. Therefore care must be taken to ascertain any changes in mood or behaviour without attributing that to the child's condition. Every effort must be made to overcome barriers to communication and ensure the voice of the child is heard. This includes any child that may be minoritised due to their life circumstances.

Where did the incident or incidents take place?
Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?
What was the explanation by all children involved of what occurred?
Can each of the children give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one child different from another and why?

What is each of the children's own understanding of what occurred?
Do the children know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the child's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the child have understanding of the impact of their behaviour on the other child?
In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Local Authority Children's Social Care.

Repetition
Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

Ongoing Risks
Are there any ongoing risks to the victim, other children, adult students or school, college or other setting staff?

Contextual Safeguarding/Extra Familial Harm
Is there any other related or wider context involving the child, including any links to child sexual exploitation or child criminal exploitation?

Risk Assessment
All risk assessments should consider:
• The victim, especially their protection and support
• Whether there may have been other victims
• The alleged perpetrator
• All the other children at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrators or from future harms and
• The time and location of the incident, and any action required to make the location safer.

Outcomes
The outcome of the investigation will follow your local threshold guidance. Therefore, either a referral has been made to either the police/Local Authority Children's social care for a full investigation (Tier 4). It may have resulted in Family Support services undertaking a further assessment (Tier 3/2). It may be that on investigation, a decision has been made to handle the incident (s) internally and which case the school may implement a risk assessment plan (Tier 1).
In any of the above outcomes, school has a duty of care to manage the education needs of both children in which case a risk assessment plan may be needed irrespective of the outcome.

Next Steps
Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the child who has been harmed (victim)
Victims may not display the whole picture immediately. It is essential that dialogue is kept open and encouraged. Children who have experienced sexual violence display a wide range of responses to their experience, including, in some cases, clear signs of trauma, physical and emotional responses, or no overt signs at all. Therefore, school will remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child irrespective of how overt the child's distress is.

What support they require depends on the individual child. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this child continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the child may need support in improving peer groups/relationships with other children or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of Relationship / Relationship and Sex Education and Health Education, PHSE and SMSC that certain issues can be discussed and debated more frequently. If the child feels particularly vulnerable it may be that a risk assessment/safety plan can be put in place for them whilst in school so that they have someone named that

they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the young person who has displayed harmful behaviour (alleged perpetrator)

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one-to-one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through a Family Support Hub referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of harmful sexual behaviour, it may be a requirement for the young person to engage in one-to-one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

A punishment or consequence such as exclusion or internal exclusion/inclusion/seclusion for a period of time may also be required to allow the child to reflect on their behaviour.

Record-Keeping

Information sharing is vital in identifying and tackling all forms of abuse, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

At Redbrook Hayes Primary School arrangements are in place that set out clearly the processes and principles for sharing information within the school or college and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Information will be shared as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care. The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on schools and to process personal information fairly and lawfully and to keep the information they hold safe and secure. Under the Data Protection Law, legitimate safeguarding concerns about a child allow school and professionals to record, share and retain even the most sensitive personal data as necessary to support school policies (even when it is not feasible to obtain consent).

After Care

It is important that following the incident the children involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the children do not engage in any further harmful behaviour either towards someone else or to themselves as a way of

coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

Safety Planning

Safety planning is a positive way of supporting a child who may benefit from a planned approach; this may be either the alleged victim or the alleged perpetrator. Safety plans support the child by considering the behaviours that may be risky and plan ways to manage triggers and to seek support from adults and peers. They are inclusive of parents and staff and are a planned intervention to support children in feeling secure in the school, helping children identify behaviours that may leave them feeling anxious or at risk and have strategies that they can apply to keep themselves feeling safe. The language of safety planning is more positive than risk assessment and can give security to the child that a joined-up approach is being followed by all in school.

Disciplinary Action and Sanctions

Taking disciplinary action, issuing sanctions and still providing support are not mutually exclusive actions. In some circumstances, the school may need to consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour; (b) to demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and (c) to ensure the safety and wellbeing of other children. However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action or sanctions school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

Where appropriate, school will consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the school. Engaging in Fair Access Panel Processes to assist with decision-making associated to managed moves and exclusions can also be beneficial. Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and school will always consider the wider actions that may need to be taken.

Review of Circumstances

Following any incident of harm, it is necessary for the school to consider if anything could have been done differently to prevent similar circumstances occurring again.

References

This policy has been heavily supported by the key document:

Farrer and Co: Addressing child-on-child abuse: a resource for schools and colleges, September 2024
https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/addressing-child-on-child-abuse.pdf

This policy should be read in conjunction with:

- Redbrook Hayes Primary School's Safeguarding and Child Protection Policy 2026-27 and the Local safeguarding partnership arrangements.
- DFE: Keeping Children Safe in Education. September 2026 https://assets.publishing.service.gov.uk/media/6ac3c09c11ed58342ad8e4ac/Keeping_children_safe_in_education_2026.pdf
- DFE: Preventing and Tackling Bullying: Advice for head teachers, staff and governing bodies. July 2017 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

• Working Together to Safeguard Children, 2026 https://assets.publishing.service.gov.uk/media/69fb1c28d0e316a40f269a5b/Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf

• Sharing nudes and semi nudes: advice for education settings working with children and young people, March 2024 - https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

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