

## Child-on-Child Abuse Policy and Procedures including Sexual Violence and Harassment

### Contents

1. [Introduction](#)
2. [Guiding Principles](#)
3. [Purpose of the policy](#)
4. [The School's responsibilities](#)
5. [Prevention](#)
6. [What is child-on-child abuse?](#)
7. [Harmful sexual behaviours \(HSB\)](#)
8. [Sexual violence and sexual harassment](#)
9. [Other behaviour](#)
10. [Identifying child-on-child abuse](#)
11. [Vulnerable groups](#)
12. [Contextual Safeguarding](#)
13. [Multi-agency working](#)

[Annex 1 - Responding to concerns or allegations of child-on-child abuse](#)

[Annex 2 - Extract from Cambridgeshire & Peterborough Safeguarding Children Partnership](#)

[Board Child Sexual Abuse Assessment Tool - assessing sexualised behaviour](#)

[Annex 3 - Flow chart for a response to a report of sexual violence and/or sexual harassment](#)

[Annex 4 - Safety Plan for child-on-child Abuse/ Harmful Sexual Behaviour](#)

[Annex 5 - Support for young people](#)

## 1. INTRODUCTION

- 1.1. This policy is applicable to all of the nurseries and schools of the Stephen Perse Foundation (the **School**). It is applicable to the whole school community, including the Early Years Foundation Stage (EYFS) and to boarders.
- 1.2. The School recognises that children are vulnerable to and capable of abusing other children (often referred to as child-on-child abuse). We take such abuse as seriously as abuse perpetrated by an adult.

## 2. GUIDING PRINCIPLES

### 2.1. This Policy:

- is the School's overarching policy for any issue that could constitute child-on-child abuse. It relates to, and should be read alongside, the School's Safeguarding and Child Protection policy and any other relevant School policies including, but not limited to, PSHEE Relationships and Sex Education, Anti-Bullying (including cyber-bullying), Online Safety, Technology Acceptable Use Policy for Pupils, Attendance and Behaviour, Rewards and Sanctions.
- sets out our procedures for preventing, identifying and appropriately managing child-on-child abuse. This applies to all members of the School's Governing Body, Operational and Educational Executive, the Senior Leadership Teams of each individual school, and all staff. It is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed.
- is compliant with the statutory guidance on child-on-child abuse as set out in the Department for Education (**DfE**) Keeping Children Safe in Education (September 2025) (**KCSIE 2025**) statutory guidance.
- ensures that a safeguarding approach is taken to all individuals involved in allegations of or concerns about child-on-child abuse, including those who are alleged to have been abused and those who are alleged to have abused their peers, in addition to any sanctioning that may also be required for the latter. We recognise 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, their family or adults in the community prior to their abuse of peers.
- uses the terms 'child' and 'children', which are defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to child-on-child abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all students, regardless of age. Although the starting point is that the School's response to child-on-child abuse should be the same for all students, regardless of age, there may be some additional considerations in relation to a student aged 18 or over in terms of how local agencies and/or partners respond. This, for example, is likely to be different on the part of local authorities, given that their safeguarding duties are limited, in the case of children's social care services - save for a number of specific exceptions - to children under the age of 18. Similarly, the School's response to incidents involving the exchange of youth produced sexual imagery will need to differ depending on the age of the students involved. There is also likely to be a more significant criminal justice response, where applicable, in relation to any student responsible for abuse who is aged 18 or over.

### 3. PURPOSE OF THE POLICY

3.1. Children and young people may be harmful to one another in a number of ways which may be classified as child-on-child abuse.

3.2. This policy considers:

3.2.1. What child-on-child abuse is and what it looks like;

3.2.2. The prevention of child-on-child abuse;

3.2.3. How we can respond appropriately and proportionately to concerns or instances of child-on-child abuse, including child-on-child sexual violence and sexual harassment;

3.2.4. What appropriate support and intervention can be put in place to meet the needs of the individual(s) involved; and

3.2.5. What preventative strategies may be put in place to reduce further risk of harm.

### 4. THE SCHOOL'S RESPONSIBILITIES

4.1. The School's Governing Body, Operational and Educational Executive Committee (the OpEd Exec), the Senior Leadership Teams (SLTs) and all staff at the School are committed to the prevention, early identification, and appropriate management of child-on-child abuse (as defined below) both within and beyond the School.

4.2. In particular, we:

- operate a zero tolerance approach to abuse. Such behaviour should never be accepted or dismissed as being normal between young people, as 'banter', 'just having a laugh', 'children being children' or simply 'part of growing up';
- believe that in order to protect children, all schools should (a) be aware of the nature and level of risk to which their students are or may be exposed; (b) put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and (c) take a whole-school community Contextual Safeguarding approach to preventing and responding to child-on-child abuse;
- regard the introduction of this policy as a preventative measure. We do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it;
- believe that in order to tackle child-on-child abuse proactively, it is necessary to focus on all four of the following areas:
  - (i) systems and structures
  - (ii) prevention
  - (iii) identification
  - (iv) response/intervention
- recognise national and increasing concern about this issue, and wish to implement this policy in order to mitigate harmful attitudes and prevent child-on-child abuse in the School and each individual school; and
- encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.

### 5. PREVENTION

5.1. The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- Educating all Governors, members of the OpEd Exec, the SLTs, staff and volunteers, students (in an age appropriate way) and parents about this issue. This includes:
  - training all Governors, members of the OpEd Exec and SLTs (in 1-11 and 11-18 respectively), staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. The training includes: a) Contextual Safeguarding; b) the identification and classification of specific behaviours; and the importance of taking seriously all forms of child-on-child abuse (no matter how low-level they may appear) and c) ensuring that no form of child-on-child abuse is ever dismissed as horseplay, teasing or as ‘children being children’;
  - educating children about the nature and prevalence of child-on-child abuse via PSHEE, Relationships and Sex Education and the wider curriculum. Students are told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are informed about the School’s approach to such issues, including its zero tolerance policy towards all forms of child-on-child abuse; and
  - involving parents in our approach to child-on-child abuse, including through parent surveys and curriculum information.
- Monitoring safeguarding records relating to child-on-child abuse to spot and address any concerning trends and identify students who may be in need of additional support. This is done through weekly meetings between the Designated Safeguarding Lead (DSL) and the Deputy Designated Safeguarding Lead (DDSLs) in each school reviewing MyConcern, termly School Safeguarding Committee meetings and supervision training with the Safeguarding Network.
- Challenging the attitudes that underlie such abuse, both inside and outside the classroom and the School.
- Working with Governors, the OpEd Exec, the SLTs, all staff and volunteers, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community.
- Creating conditions in which our students can aspire to and realise safe and healthy relationships.
- Creating a culture in which our students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to.
- Responding to cases of child-on-child abuse promptly and appropriately.

## 6. WHAT IS CHILD-ON-CHILD ABUSE?

- 6.1. Child-on-child abuse is sexual, emotional or physical abuse that happens between children and within children’s relationships (both intimate and non-intimate), friendships and wider peer associations. It can happen between any number of children, and can affect any age group (DfE, 2021).
- 6.2. Child-on-child abuse can take various forms and, as stated in KCSIE 2025, is most likely to include, but may not be limited to:

- 6.2.1. bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - 6.2.2. abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’);
  - 6.2.3. physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
  - 6.2.4. sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
  - 6.2.5. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
  - 6.2.6. 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;
  - 6.2.7. consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as ‘sexting’ or ‘youth produced sexual imagery’);
  - 6.2.8. upskirting, 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
  - 6.2.9. initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- 6.3. Examples of online child-on-child abuse include consensual and non-consensual sharing of nude and semi-nude images, online abuse, cyberbullying, child-on-child grooming, and harassment. Many forms of child-on-child abuse have an element of online behaviour. The School’s Anti-Bullying, Online Safety, the Technology Acceptable Use Policy, and Safeguarding and Child Protection Policy collectively set out the policy and procedures concerning this type of behaviour. The School’s Searching and Retention and Disposal of Confiscated Items Policy sets out the procedures in the situation that a staff member reasonably suspects that a student’s mobile phone (or other electronic device) has been, or is likely to be, used to commit an offence or cause personal injury or damage to property.
- 6.4. Children can experience child-on-child abuse in a wide range of settings, including at school, at home or in someone else’s home, in public spaces and online. Child-on-child abuse can often go unseen. Therefore training and awareness for professionals, to help them recognise the signs, and know what to do, is essential.
- 6.5. The impact of this behaviour on children can be very distressing. It can result in significant, long lasting and traumatic isolation, intimidation or violence to the victim and have an impact on academic achievement and emotional health and wellbeing.
- 6.6. Staff should be careful in the terminology they use to describe the students involved - whilst ‘victim’ and/or ‘perpetrator’ are used in guidance these may not be appropriate terms to use in front of the students.

## 7. HARMFUL SEXUAL BEHAVIOURS (HSB)

- 7.1. In this policy, and in our approach, we recognise the importance of distinguishing between problematic and abusive sexual behaviour. In regard to harmful sexual behaviour (**HSB**), we are adopting the NSPCC definition of HSB as: “developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive” (derived from Hackett, 2014). This term has been adopted widely in the field, and is used throughout the NSPCC (2019) Harmful sexual behaviour framework: audit tool. London: NSPCC<sup>1</sup>, as well as being adopted in this policy. It may also be referred to as “sexually harmful behaviour” or “sexualised behaviour.”

---

<sup>1</sup> <https://learning.nspcc.org.uk/media/1657/harmful-sexual-behaviour-framework.pdf>

- 7.2. As the NSPCC explains “children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB.”
- 7.3. HSB may include:
- inappropriate sexual language
  - inappropriate role play
  - sexual touching
  - sexual violence and sexual harassment.
- 7.4. Staff should always use their professional judgement and discuss any concerns with the DSL/DDSL.
- 7.5. The DSL will refer to the Safeguarding Children Partnership Board's [Child Sexual Abuse Assessment Tool](#) if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse
- 7.6. It can be difficult to work out if a child is displaying appropriate, inappropriate, problematic or abusive sexual behaviour. Staff should refer to Annex 2 for the sexual behaviours continuum model, proposed by Simon Hackett (2010), which demonstrates the range of sexual behaviours presented by children and young people, from those that are normal, to those that are abusive or violent.
- 7.7. A child's behaviour can change depending on the circumstances they are in, and sexual behaviour can move in either direction along the continuum. Therefore, it is important not to label all of a child's behaviour as belonging to one category.
- 7.8. HSB can be harmful to the children who display it as well as those who experience it. There may be many reasons why a young person engages in HSB and it may not be intended to harm others.
- 7.9. Children and young people who display HSB may have complex needs and may display other behavioural problems alongside their HSB (Hollis, 2017). For example, children who display HSB may:
- have poor self-regulation and coping skills
  - experience social anxiety and a sense of social inadequacy
  - have poorly internalised rules for social behaviour
  - have a poorly developed sense of morality
  - lack secure and confident attachments to others
  - have limited self-control and act out emotional experiences through negative or otherwise inappropriate behaviour
  - have little insight into the feelings and needs of others or their own mental state
  - place their own needs and feelings ahead of the needs and feelings of others
  - show a poorly defined sense of personal boundaries
  - have developed strong and not easily corrected cognitive distortions about others, themselves, and the world they share
  - have deficits in social skills and in social competence overall.
- 7.10. As children develop healthily, it is normal for them to display certain types of behaviour. It is important that adults who work or volunteer with children can identify if any behaviour has become harmful or abusive, and respond proportionally to keep all the children involved safe.

## 8. SEXUAL VIOLENCE AND SEXUAL HARASSMENT

- 8.1. Where the misconduct may constitute sexual violence<sup>2</sup> (rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent) or sexual harassment, it must always be reported to the DSL/DDS and will be managed in accordance with this policy, with particular reference to Annex 1.
- 8.2. Sexual violence and sexual harassment can occur between two or more children of any age or sex. 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.
- 8.3. It can take place in spaces which are supervised or unsupervised. Within a school context, for example, child-on-child abuse might take place in spaces such as toilets, the playground, corridors and when children are walking home (Contextual Safeguarding Network, 2020).
- 8.4. Examples of sexually abusive behaviour may include:
- inappropriate or unwanted sexualised touching
  - pressurising, forcing or coercing others to perform or take part in sexual acts
  - pressuring, forcing or coercing someone to share nude images (sexting)
  - sharing sexual images of a person without their consent
  - taking a picture under a person's clothing, without their consent ('upskirting')
  - sexual harassment
  - sexual or sexist name calling
- (Contextual Safeguarding Network, 2020).
- 8.5. Staff should be aware of the importance of:
- making clear that sexual violence and sexual harassment are not acceptable, will never be tolerated and is not an inevitable part of growing up;
  - not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "children being children";
  - recognising that, even if there are no reports in our setting, it does not mean it is not happening;
  - challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Recognising that dismissing or tolerating such behaviours risks normalising them.
- 8.6. Abuse rarely takes place in isolation and often indicates wider safeguarding concerns. For example, a child may be in a sexually exploitative relationship with another child who is himself/herself being physically abused by a family member or by another child/adult. Equally, sexual violence and sexual harassment in schools and other settings can result in the sexual exploitation of children by their peers. For 16 and 17 year olds who are in abusive relationships, what may appear to be a case of domestic violence may also involve sexual exploitation. 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 experiences.

---

<sup>2</sup> When referring to sexual violence, the statutory guidance refers to sexual offences under the Sexual Offences Act 2003, as described above.

- 8.6.1. This can be done by adopting a contextual safeguarding approach (see below) and by ensuring that our response to incidents of child-on-child abuse takes into account any potential complexity.
- 8.6.2. Child-on-child sexual violence and harassment must always be referred immediately to the DSL or a DDSL. The DSL/DDSL will follow procedures set out in KCSIE 2025 - Part Five. See also Annex 3 of the School's Safeguarding and Child Protection Policy which sets out how staff should respond to an incident of nudes and semi-nudes<sup>3</sup> being shared by students.

## 9. OTHER BEHAVIOUR

- 9.1.1. When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff need to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, 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
- 9.1.2. It should also be recognised that the same behaviour presented by different children may be understood to be at different points on a spectrum, depending on the particular context. For example, an incident involving the sharing of nude or semi-nude images may be inappropriate in one context, for example, when exchanged between two children in a consenting relationship, and abusive in another, for example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or (c) used to pressure the child into engaging in other sexual behaviours.
- 9.1.3. 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. For example, a physical fight between two children may not constitute child-on-child abuse where the fight is a one-off incident, but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.
- 9.1.4. The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual student basis, but could also apply across the student body.
- 9.1.5. Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which the School will need to take a whole-school approach in order to prevent escalation. For example, where multiple students are making inappropriate comments about

---

<sup>3</sup> The Government guidance "[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)" uses the term "'sharing nudes and semi-nudes' to mean the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline." (paragraph 1.4).

other students, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise and/or revising the School's PSHEE or RSE curriculum plan.

- 9.1.6. It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, the School will follow the procedures set out in Annex 1.

## **10. IDENTIFYING CHILD-ON-CHILD ABUSE**

- 10.1. All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.
- 10.2. Child-on-child abuse will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm and will warrant a response under these procedures.
- 10.3. All staff should be alert to the well-being of students 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.
- 10.4. Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse (please see Part 3 and Annex 2 of the School's Safeguarding and Child Protection Policy for indicators of abuse) and can include:
- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected of the child;
  - unexplained physical injuries;
  - signs of self harm;
  - experiencing difficulties with mental health and/or emotional wellbeing;
  - becoming withdrawn and/or shy;
  - experiencing headaches, stomach aches, anxiety and/or panic attacks;
  - suffering from nightmares or lack of sleep or sleeping too much;
  - broader changes in behaviour including alcohol or substance misuse;
  - changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
  - a change in friendships or relationships with older individuals or groups;
  - unexplained gifts or new possessions;
  - abusive behaviour towards others.
- 10.5. Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated.
- 10.6. Where a child exhibits any behaviour that is out of character or abnormal for his/her age or out of step with their developmental stage, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or

abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

- 10.7. The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of child-on-child abuse, a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

## 11. VULNERABLE GROUPS

- 11.1. We recognise that all children can be at risk however we acknowledge that some groups are more vulnerable to child-on-child abuse. This can include students who:

- have experience of abuse within their family;
- live with domestic violence;
- are in care;
- have special educational needs and/or a disability or certain health conditions and specific additional needs;
- lack close friends at school or (for boarders) in the boarding house;
- are shy;
- come from an over-protective family environment;
- are from a different racial, religious or cultural group to the majority;
- identify as lesbian, gay, bi or trans (LGBT) or those perceived to be by peers (whether they are or not) can be just as vulnerable as children who identify as LGBT;
- are different in some obvious respect from the majority;
- are adopted;
- are a 'provocative victim' (a child who behaves inappropriately with others, barging in on their games or being a nuisance);
- are obviously sensitive;
- have caring responsibilities
- share overnight accommodation with other children (for example in boarding or during school trips).

- 11.2. The School recognises that boys and girls experience child-on-child abuse, but different gender issues can be prevalent in child-on-child abuse, for example, girls may be more likely to be victims of sexual harassment or boys may be more likely to be subjected to initiation/hazing type violence and rituals.

- 11.3. The School also recognises that the experience of students in the boarding houses will be different to those living at home. All boarders live in single, en-suite accommodation. Particular thought is given to boarders' age in determining the location of their accommodation. Boarders have ready access to a wide group of boarding staff to whom they can talk or raise concerns. All members of boarding staff have appropriate safeguarding training and include a Mental Health First Aider. All boarding students are given the contact details for the Independent Person, and other sources of external support, and staff explain what the role of the Independent Person is and that boarders can contact them at any time.

- 11.4. All students, including boarding students, are made aware of the School's policy, as set out in the School's Behaviour, Rewards and Sanctions Policy that sexual relations between students whilst under the care of the School, irrespective of location, constitutes misconduct which is considered to be a serious breach of discipline. Boarding staff and staff on trips are particularly alert to potential inappropriate pupil or student relationships and the potential for child-on-child abuse in these environments.

11.5. Accommodation of students during school trips is considered carefully and the hazards inherent in child-on-child abuse are given particular consideration in the development of each trip's risk assessment, with careful thought given to risky behaviours and locations, particularly vulnerable pupils, the constituents of individual rooms, lengths of time when pupils are in their rooms unsupervised, levels of supervision when pupils are in their rooms and the proximity of staff accommodation. All students are briefed to raise any concerns during their trip.

12. CONTEXTUAL SAFEGUARDING

12.1.1. This policy encapsulates a contextual safeguarding approach which:

12.1.1.1. is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts, acknowledges that safeguarding incidents and behaviours may be associated with factors outside the School, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities;

12.1.1.2. recognises that as children enter adolescence they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse, and seeks to understand the impact of these wider social contexts;

12.1.1.3. considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a boarding house, pastoral and boarding staff could work with the Senior Leadership Team (SLT) and student body to challenge a harmful or insensitive boarding house culture, thus improving the pre-existing school environment;

12.1.1.4. looks at the way professionals approach child protection when risks occur outside the family, thereby requiring all those within a local safeguarding partnership to consider how to work alongside, rather than just refer into, children's social care.

13. MULTI-AGENCY WORKING

13.1. The School actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, the relevant Safeguarding Partnership Board (which is the Cambridgeshire and Peterborough Safeguarding Children Partnership Board (CPSCPB) for all schools in the School apart from Dame Bradbury's where the Essex Safeguarding Children Board (ESCB) applies), the police and/or other relevant agencies (in accordance with the relevant Local Safeguarding Partnership's procedures) and other schools. We will actively refer concerns/allegations of child-on-child abuse to children's social care or other relevant agencies, where necessary.

**Version Control**

Date of adoption of this policy	8 October 2025
Date of last review of this policy	August 2025
Date for next review of this policy	August 2026
Policy owner	DSL
Authorised by	Governing Body



## **Annex 1 - Responding to concerns or allegations of child-on-child abuse**

### **1. General principles**

- 1.1. It is essential that all concerns/allegations of child-on-child abuse are handled sensitively, proportionately, appropriately and promptly. The way in which they are responded to can have a significant impact on the school environment.
- 1.2. All staff have a responsibility to respond to, report and record any concerns in accordance with the procedures outlined in the School's Safeguarding and Child Protection Policy.
- 1.3. If a student is in immediate danger, or at risk of significant harm, a referral to children's social care (if the student is aged under 18) and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL or a DDSL, the DSL or DDSL should be informed as soon as possible that a referral has been made (see Sections 2, 4 and 5 of the School's Safeguarding and Child Protection policy).
- 1.4. If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by another child/children, or that a child may be at risk of abusing or may be abusing another child/children, they should discuss their concern with the DSL, or a DDSL, without delay (in accordance with Section 5 of the Safeguarding and Child Protection policy) so that a course of action can be agreed.
- 1.5. If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details about how to respond, please see the procedure set out in section 5 of the Safeguarding and Child Protection policy.
- 1.6. Any response will be coordinated by the DSL or a DDSL and should:
  - include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
  - treat all children involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. We will aim to ensure a safeguarding response for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter;
  - ensure information gathering as soon as possible to ascertain what has happened and whether any other students are aware or involved. 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. Avoid language that may create a 'blame' culture and leave a child labelled. An example is instead of calling a child a 'perpetrator' we may instead say 'child alleged to have caused harm';
  - take into account that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/childrens' online presence. Consider what changes may need to be made to these contexts to address the child's/childrens' needs and to mitigate risk; and the potential complexity of child-on-child abuse and of childrens' experiences and consider the interplay between power, choice and consent. While children may appear to be

making choices, if those choices are limited they are not consenting;

- the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL/DDSL should discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. The School should manage the child/childrens' expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

## **2. Responding to concerns or allegations of child-on-child abuse**

- 2.1. The DSL/DDSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.
- 2.2. While determining the level of incidents is not always clear-cut we consider the following factors as a guide:
  - chronological and developmental ages of everyone involved;
  - difference in their power or authority in relation to age, race, gender, physical, emotional or intellectual vulnerability;
  - all alleged physical and verbal aspects of the behaviour and incident;
  - whether the behaviour involved inappropriate sexual knowledge or motivation;
  - what was the degree of physical aggression, intimidation, threatening behaviour or bribery;
  - the effect on the victim and any ongoing risks to victim and others;
  - any attempts to ensure the behaviour and incident is kept a secret;
  - the child or young person's motivation or reason for the behaviour, if they admit that it occurred;
  - whether this was a one-off incident, or longer in duration; and
  - other related issues and wider context.
- 2.3. Cases of child-on-child abuse can be complex, may involve multiple young people, and consent may be unclear. This is especially difficult when young people may be suspected of being harmed but also involved in the harm of others. In some instances it may be most appropriate, for schools to respond internally. However in other instances, cases may require a referral to the police and/or social care. The DSL/DDSL will refer to the below steps and the flow chart (Annex 3) and consider the following when deciding if an incident requires referral to police/ social care.
- 2.4. If the incident involves sharing of nude and semi-nude images, staff must avoid viewing any pornographic images of children and should ensure such images are not deleted from devices, as they may form part of a police investigation. National guidance on 'sexting' will be followed<sup>4</sup>.
- 2.5. The DSL/DDSL should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL/DDSL may wish to consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL/DDSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL/DDSL should contact Children's Social Care immediately, and in any event within 24 hours of the DSL/DDSL becoming aware of it. The DSL/DDSL will discuss the allegations/concerns with the Community Social Worker/Family

---

<sup>4</sup> UKCCIS Guidance on sexting.

Front Door and agree on a course of action, which may include:

### **2.5.1. Managing internally**

2.5.1.1. Managing internally with help from external specialists where appropriate and possible. Where behaviour between children is abusive or violent (as opposed to inappropriate or problematic), undertaking or contributing to an inter-agency early help assessment, a referral to children's social care and/or reporting alleged criminal behaviour to the police should ordinarily apply. However, where support from local external agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from relevant specialists (either in the private and/or voluntary sector), as appropriate. These might include psychologists, psychotherapists, counsellors etc.

**2.5.2. Undertake/contribute to an inter-agency early help assessment**, with targeted early help services provided to address the assessed needs of a child/children and their family. These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.

**2.5.3. Refer child/children to children's social care** for a section 17 and/or 47 statutory assessment. The referral will be made to children's social care in the area where each child involved lives. As a matter of best practice, if an incident of child-on-child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

### **2.5.4. Reporting alleged criminal behaviour to the police**

2.5.4.1. Alleged criminal behaviour will ordinarily be reported to the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police, for example, where the exchange of youth produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

2.5.4.2. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed on to the police as a matter of urgency. Whilst the age of criminal responsibility is ten, if the child alleged to have caused harm is under ten, the starting principle of reporting to the police remains.

2.5.4.3. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff, the child alleged to have caused harm, their parents or carers and others, as appropriate. The School will also discuss with the police the best way to protect the victim and their anonymity.

2.5.4.4. Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought in order to support this.

2.5.4.5. Whilst protecting children and/or taking any disciplinary measures against the child alleged to have caused harm, we will work closely with the police (and other agencies as required), to ensure any actions the School take do not jeopardise the police investigation.

### **2.5.5. Individual risk and needs assessment**

2.5.5.1. Where there is an incident of child-on-child abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse in accordance with the

School's Risk Assessment Policy for Student Welfare. These risk assessments will:

- assess and address the nature and level of risks that are posed and/or faced by the child;
- engage, where appropriate, the child's parents and where appropriate, draw upon local services and agencies to ensure that the child's needs are met in the long-term. Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child; and
- be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

2.5.5.2. If at any stage the child's needs escalate, the DSL/DDSL should contact the relevant Local Safeguarding Partnership Board and act in accordance with their safeguarding and child protection procedures, to determine the appropriate course of action.

#### **2.5.6. Action under the School's Behaviour, Rewards and Sanctions Policy**

2.5.6.1. The School will 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 will 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, the 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.

2.5.6.2. The School will, where appropriate, consider the potential benefit, as well as challenge, of imposing sanctions such as expulsions, suspensions and fixed term exclusions 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. Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

#### **2.5.7. On-going proactive work to a whole-school approach**

2.5.7.1. The School's response to concerns/allegations of child-on-child abuse will form part of on-going proactive work by the School to embed best practice and take a contextual whole-school approach to such abuse. As such the School's response is part of its wider prevention work. This response may include the School asking questions about the context in which an incident of child-on-child abuse occurred in the school, the local community and the wider physical and online environment - such as:

- What protective factors and influences exist within the School (such as positive peer influences, examples where child-on-child abuse has been challenged etc) and how can the School bolster these;
- How (if at all) did the School's physical environment contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision;
- Did wider gender norms, equality issues and/or societal attitudes contribute to the abuse;
- What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forwards;
- Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse;

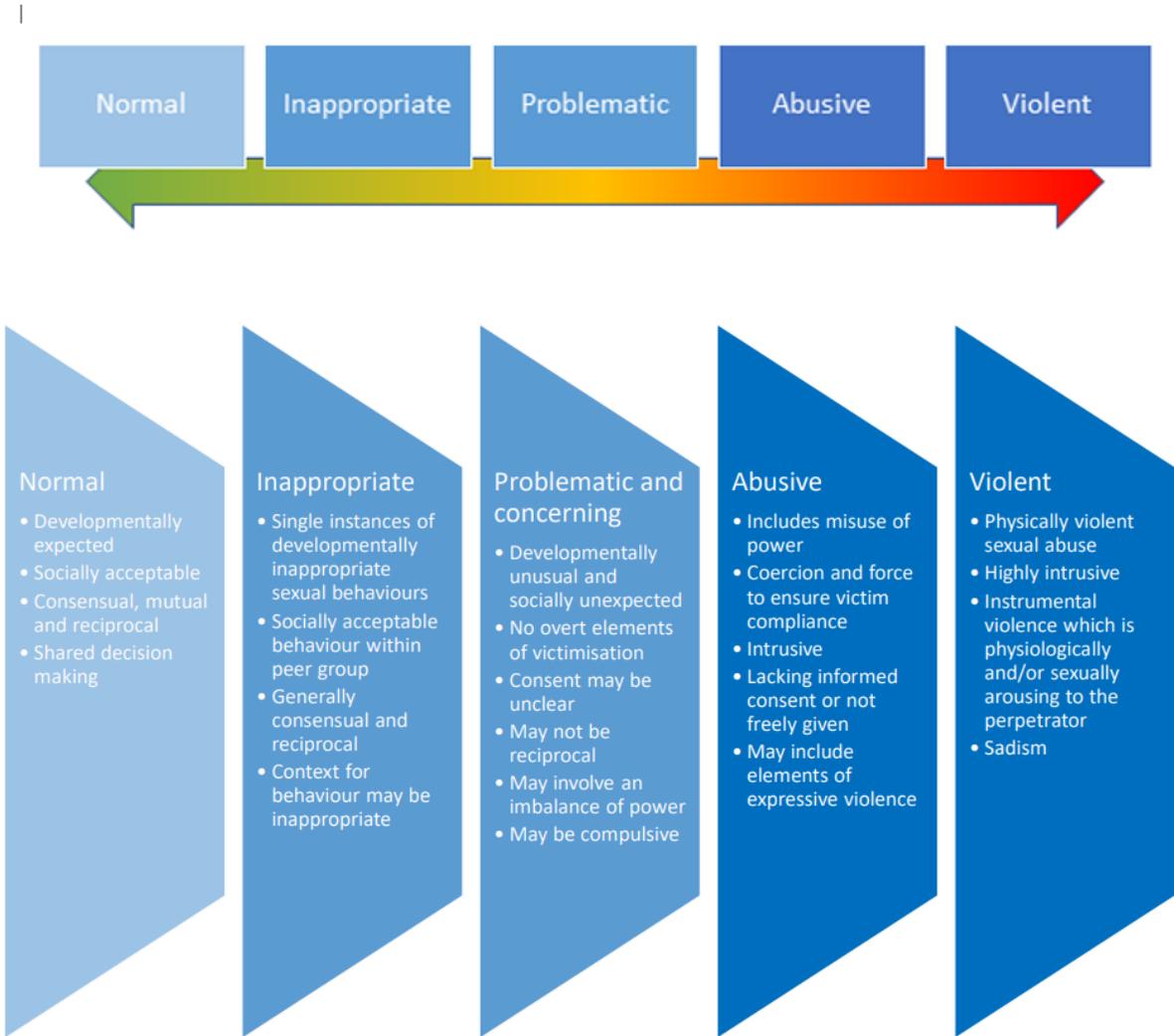
- How have similar cases been managed in the past and what effect has this had;
- Does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent child-on-child abuse, including by way of the PSHEE/RSE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work;
- Are there any lessons to be learnt about the way in which the School engages with parents to address child-on-child abuse issues;
- Does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour; and
- Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other students in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by school leadership and the DSL/DDSL.

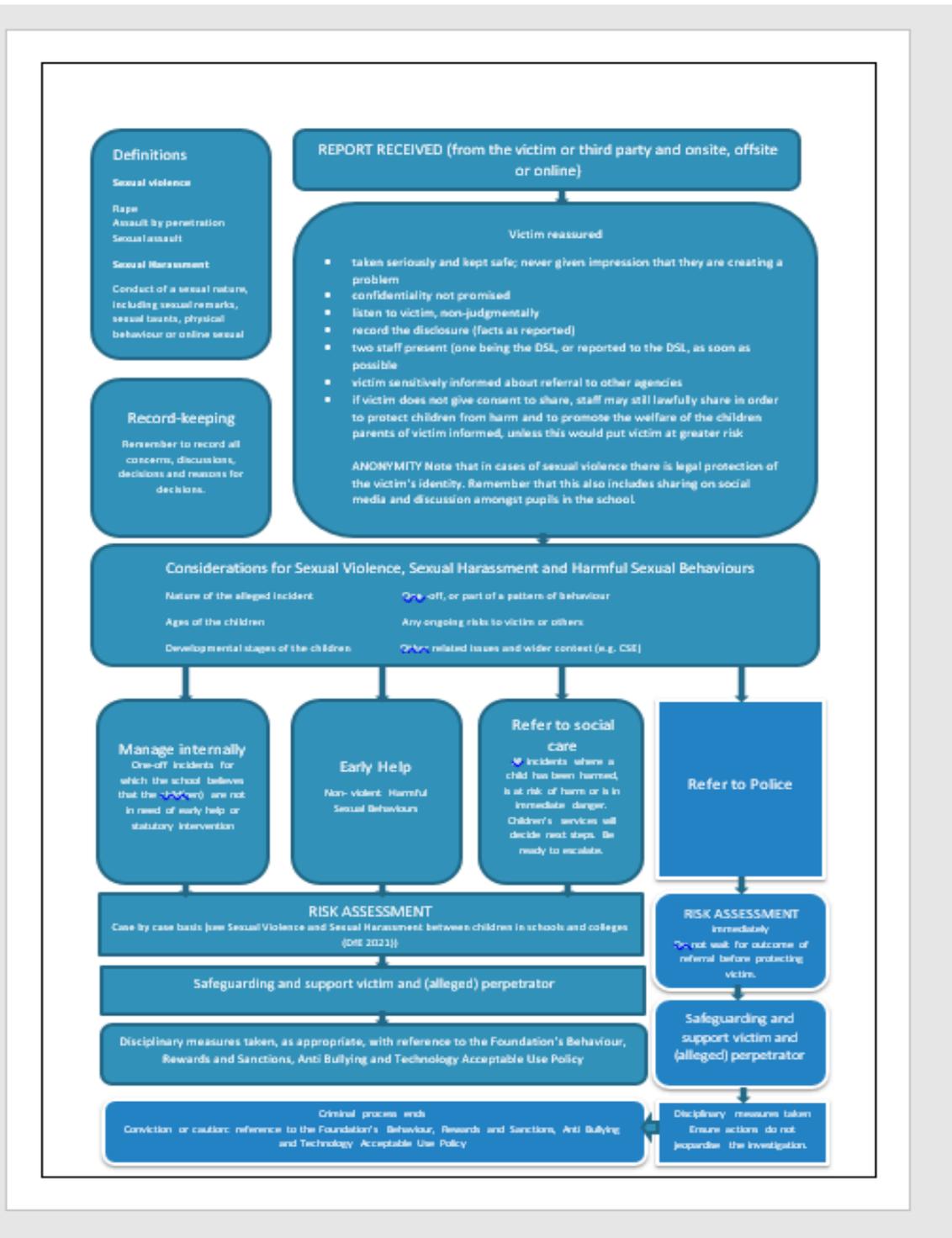
**Annex 2 - Extract from the Cambridgeshire & Peterborough Safeguarding Children Partnership Board Child Sexual Abuse Assessment Tool - assessing sexualised behaviour**

Sexualised behaviour should be seen as a continuum, ranging from 'normal' to 'inappropriate', to problematic, on to 'abusive' and to 'violent' behaviours (Hackett, 2010).

Please note that the examples given are guidelines. Specific incidents may have mitigating or aggravating features that move assessment of a particular behaviour, up or down the continuum.



### Annex 3 - Flow chart for a response to a report of sexual violence and/or sexual harassment



**Annex 4 - Safety Plan for child-on-child Abuse/ Harmful Sexual Behaviour**

This Safety Plan is intended to be used by Schools whereby an incident(s) of child-on-child abuse has occurred or is likely to occur.

The Safety Plan will show considerations made for both/all students involved and will highlight the plan in place to keep all students safe. This will also take into consideration the wishes and feelings of all children involved. Each section/question will be considered from the perspective of all students involved. Considerations will also be given for the impact on, and needs of, the wider school community. All concerns and proposed actions will be recorded.

The School will work with the local multi-agency safeguarding hub (MASH), the Education Safeguarding Lead and other agencies as necessary when completing this risk assessment. This document should be reviewed frequently to ensure it is fit for purpose.

The terms victim and child alleged to have caused harm are used to identify the children involved. NB: there should be no assumption of guilt on the part of the child alleged to have caused harm, pending investigation.

\*A risk assessment should be completed for all cases relating to sexual violence or alleged sexual violence. Sexual violence is defined by the sexual offences act 2002 as “criminal acts: rape, assault by penetration and sexual assault”.

\*This risk assessment should be completed with reference to KCSIE 2025.

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

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

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

**Further action taken by the school or college: Please make a copy and complete for each child involved. Add as an attachment to MyConcern.**

Action	YES/ NO	Date
Police informed		
Referral to MASH		
Referral to external support services		

Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		

## **Annex 5 - Support for young people**

- [Anti-Bullying Alliance](#) - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.
- [Rape Crisis](#) - Provides and signposts a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.
- [The Survivors Trust](#) - UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.
- [Victim Support](#) - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.
- [Childline](#) - Provides free and confidential advice for children and young people.