



ST PAUL'S
GIRLS' SCHOOL

Child-on-Child Abuse Policy

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Legal framework

- Keeping Children Safe in Education 2026
- Part 3, Paragraph 7 (safeguarding) of the Education (Independent School Standards) (England) Regulations 2014
- Working Together to Safeguard Children 2026
- Equality Act 2010
- Farrer & Co Addressing Child-on-Child Abuse: A Resource for Schools and Colleges (Sept 2024)
- NSPCC Guidance on Child on Child Abuse (2026)

Availability of this policy

A copy of this policy may be downloaded from our [website](https://www.spgs.org) or is available on request from the school office, St Paul's Girls' School, Brook Green, London, W6 7BS (tel: 0207 603 2288). This policy can be made available in large print or other accessible format if required.

Who this policy applies to

This policy applies to all members of the school's community, including students, parents, employees, temporary staff, contractors, agency workers, visiting music teachers and other peripatetic workers, volunteers, governors and all other people when working in or for the school. It applies whenever staff or volunteers are working with students, even where this is away from the school, e.g., on a school trip.

What this policy is for

This policy aims to:

- Outline the school's response to allegations of child-on-child abuse (including harassment and violence)
- Describe the school's strategy to prevent child-on-child abuse
- Outline the ways in which the school raises awareness of child-on-child abuse and promotes a positive and safe environment.

Other relevant school policies

- Safeguarding (Child Protection) policy
- Acceptable Use policy
- Mental Health and Wellbeing policy
- Behaviour policy
- Anti-Bullying policy
- Taking, Storing and Using Images of Children policy
- Searching, Screening and Confiscation policy
- Online Safety Policy
- Supporting Transgender and Gender-Questioning (TGQ) Students policy

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Introduction

1.1 The whole community of St Paul's Girls' School (including Governors, all staff, parents, students and volunteers) is committed to the early identification, intervention against, and prevention of, all forms of child-on-child abuse, both in and out of school. The school commits to proactive prevention, early identification, trauma-informed responses, and a culture of safeguarding in line with KCSIE and statutory duties:

- To protect and safeguard children, the school should be aware of the complexities of the risks which students may face and create and enforce a clear and comprehensive strategy which is suited to all their safeguarding needs ensuring integrated policy alignment
- To enforce, through mandatory induction, training, and clear policies and procedures, a whole-school approach in response to child-on-child abuse ensuring victim-centred and coordinated responses
- To prevent child-on-child abuse and not merely adopt a reactive approach to child-on-child abuse as a response to an alleged serious incident
- To participate in multi-agency information sharing through partnering with local authorities, the police, and social care providers to manage high-threshold risks or child protection referrals
- To ensure robust record-keeping by maintaining secure, contemporaneous written logs of all incidents, interventions, and safety mapping outcomes via the Designated Safeguarding Lead
- To encourage parents to participate in school procedures so that if a student is made to feel unsafe by the behaviour of one of their peers, they should inform the school immediately so that immediate and proportionate action can be taken.

1.2 The policy does not use the terms “perpetrator” and “abuser”. This is because the school actively adopts a safeguarding approach to all those involved in allegations of, or concerns about, child-on-child abuse. Research shows that some young people who engage in such abuse have sometimes been victims of it themselves, and that they are therefore vulnerable, and that context is vital in assessing such harmful behaviour, and in deciding any sanctions which may apply.

1.3 This policy refers to “students” or “young people” who are both defined as being under 18 years old, but this policy also reflects the school's commitment to a wider approach to safeguarding. The school recognises that there may be additional considerations in relation to students who are over 18, or under 10, in terms of how local agencies or partners respond. In addition, the school's approach to student-produced sexual imagery will differ, depending on the age of the students involved. (See the Taking, Storing and Using Images of Children Policy.)

1.4 In addition, this policy builds on, *Keeping Children Safe in Education* (September 2026), *Sexting in schools and colleges: responding to incidents and safeguarding children* (UKCCIS), *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (2024), the NSPCC's and Research in Practice's *Harmful Sexual Behaviour Framework*. Farrer and Co. Addressing child-on-child abuse: a resource for schools and colleges (September 2024). Hammersmith and Fulham Safeguarding Policy and Procedures.

What is child-on-child abuse?

2.1 Child-on-child abuse is defined as “any form of physical, sexual and emotional and financial abuse, and coercive control, exercised between children and within children's relationships, both intimate and non-intimate” (*Abuse between young people: a contextual account* (Routledge 2017)).

2.2 All staff should be aware that child-on-child abuse (including harassment and violence) takes many forms and can occur face-to-face, online, in school and outside of school and simultaneously between each of these. This is most likely to include, but is not limited to:

- Bullying (including cyberbullying, prejudice based, homophobic and discriminatory (including misogyny/misandry) bullying)

- Hate incidents and hate crimes
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual abuse (including abuse in intimate personal relationships between children often referred to as 'teenage relationships abuse' which may include an online element physical, sexual, emotional abuse (including verbal abuse), coercive control, exploitation, and stalking). See Appendix 1
- Harmful sexual behaviour which can include sexual violence such as rape, assault by penetration, sexual assault, causing someone to engage in sexual activity without consent
- Sexual harassment which is unwanted conduct of a sexual nature such as sexual comments, remarks, jokes, suggestive looks or leering, sexual gestures. This may be standalone or part of a broader pattern of abuse
- Sexual harassment such as sexting, displaying pictures, photos or drawings of a sexual nature, and online sexual harassment
- The consensual or non-consensual creation, manipulation and/or sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes. It also includes revenge pornography (a criminal offence), sexual exploitation and threats
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing to obtain sexual gratification, or cause the victim humiliation, distress or alarm; it also includes downblousing
- Discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents
- Initiation/hazing type violence and rituals
- Gender-based violence
- Relationship abuse (including domestic violence) where abuse takes place within
- existing intimate relationship(s).

2.3 All child-on-child abuse is unacceptable and will be taken seriously. Staff must be aware that young people may be abused out of school but should not minimise the potential risks of student-on-student abuse within school too, recognising that it can also take place online.

2.4 All staff recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

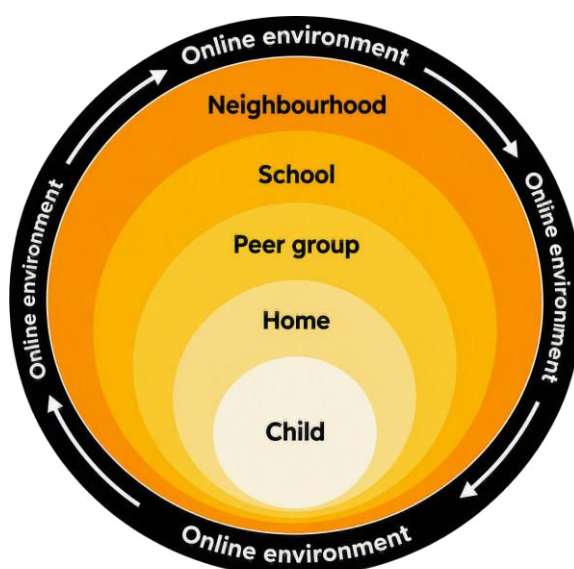
2.5 The school recognises that child-on-child abuse must be addressed in the terms of the context in which it occurs. **Contextual safeguarding** recognises an approach which understands the harm and abuse to which young people can be exposed **beyond their families**.

2.6 As the school operates a contextual approach to safeguarding, it recognises the need to work alongside a Local Safeguarding Children Partnership, rather than just referring young people to it. This means that the school:

- is aware of, and seeks to understand, the effect that wider social contexts have on young people
- is committed to creating a safe culture by implementing all the policies and procedures that address child-on-child abuse
- is committed to creating healthy relationships and attitudes to gender/sexuality and all forms of difference

- will provide training for staff and students on potential bias and stereotyping and commit to an inclusive approach for all members of the school community
- will commit to identifying potential geographical “hotspots” on the school site which could be risky for students, thus improving the pre-existing school environment for students. These “hotspots” can also include certain year groups, friendship clusters etc.
- will be alert to, and monitor, changes in students’ behaviour, emotional wellbeing and attendance
- will be alert to wider contextual concerns, including links to child sexual exploitation (CSE) or child criminal exploitation (CCE)
- in working with local agencies, contribute to the debate and implementation of child protection decisions by challenging threshold decisions which do not seem to be in the interest of the young person and will consistently refer cases using a contextual approach.

Contextual circles of adolescent vulnerability



How widespread is child-on-child abuse?

3.1 According to the NSPCC Learning Child Sexual Abuse Briefing (January 2025), 1 in 20 young people aged 11-17 have been sexually abused, Sexual abuse is usually hidden from view so, and the school cannot know exactly how many children in the UK experience sexual abuse but the majority of young people who experience contact sexual abuse are abused by someone they know, including peers.

When does behaviour become problematic or abusive?

3.2 All behaviour takes place on a spectrum as suggested by Professor Simon Hackett. In order to respond appropriately, understanding where a young person’s behaviour falls on the spectrum is important. Below is Professor Hackett’s model which demonstrates the range of sexual behaviour which can be presented by young people. It is not exhaustive but offers a means by which this behaviour can be understood to allow staff to react to it sensitively and proportionately.

Sexual behaviours continuum model

Normal	Inappropriate	Problematic	Abusive	Violent
◦ Developmentally expected	◦ Single instances of inappropriate sexual behaviour	◦ Problematic and concerning behaviour	◦ Victimising intent or outcome	◦ Physically violent sexual abuse ◦ Highly intrusive

◦ Socially acceptable ◦ Consensual, mutual, reciprocal ◦ Shared decision making	◦ Socially acceptable behaviour within peer group ◦ Context for behaviour may be inappropriate ◦ Generally consensual and reciprocal	◦ Developmentally unusual and socially unexpected ◦ No overt elements of victimisation ◦ Consent issues may be unclear ◦ May lack reciprocity or equal power ◦ May include levels of compulsivity	◦ Includes misuse of power ◦ Coercion and force to ensure compliance ◦ Intrusive ◦ Informed consent lacking or not able to be freely given ◦ May include elements of expressive violence	◦ Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour ◦ Sadism
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Are some students more vulnerable than others to child-on-child abuse?

4.1 The influence of peers is possibly the most significant factor in a young person's social development and, as such, anyone can be subject to child-on-child abuse. However, there are certain groups who may be more at risk than others. For example:

- Those who are socially isolated from their peer-group.
- Looked After Children
- Young carers
- Those who have suffered background trauma e.g. those living with domestic violence or who have a history of trauma/abuse within their families
- Those who are questioning their sexuality and identity; those who identify as LGBTQ+ or who are perceived to be
- Gender: girls and young women are more frequently identified as victims of harassment and non-consensual sexual behaviours
- Those with SEND needs: and a school must be careful not merely to assume that indicators of possible abuse relate only to their specific learning needs and are not investigated beyond this assumption
- Those from Black and minority ethnic groups
- Those with unconstrained access to technology.

4.2 Research also suggests that child-on-child abuse can affect boys and girls differently and so the school must explore gender dynamics within its individual context and recognise, and address, those factors within both a single-sex environment, but also if factors outside school are involved.

How can the school create a whole school approach to preventing child-on-child abuse?

5.1 The school is actively committed to education for its entire community (staff, students, parents, governors and volunteers) in raising awareness of, identifying, and preventing child-on-child abuse to create an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of their safeguarding responsibilities. This strategy will include:

- ensuring an understanding of contextual safeguarding
- education about online safety and the outlining of clear expectations in its Acceptable Use Policies; encouraging young people to use social media responsibly, to be conscious of their online activities, and training them to identify, report, and manage digitally abusive behaviour

- ensuring a responsive curriculum continues to educate students about digital changes. The online aspects of safety, including relating to AI, is a particular focus of the school's Digital Futures Programme and its strands on Responsible Tech and AI Literacy
- through its low-level concerns policy, ensuring that low-level concerns are followed up, treating all concerns seriously (including those minimised as 'banter' or 'teasing' and logging them in CPOMS in line with KCSIE
- educating young people about the widespread nature of child-on-child abuse. This will include Personal, Social, Economic and Health Education (PSHE) and Relationship and Sex Education (RSE) lessons about consent etc but also in the wider school curriculum where equality and respect should be promoted at all times.

5.2 Students should be regularly informed about the harmful effects of child-on-child abuse and the vulnerabilities of those who experience it, alongside possible reasons for such behaviour

5.3 Students should be clear about what actions to take if they witness such abuse, how to report it, and that the school operates a zero-tolerance approach to such incidents.

5.4 Parents should also be involved via public events and face-to-face meetings to promote this policy and an understanding of their role alongside the responsibilities of the school and students, including the need for parental control on personal devices.

Enforcing positive culture

6.1 The entire school community (governors, staff, volunteers, students and parents) should work together to promote a positive culture of tolerance and respect amongst all its members.

6.2 The whole school culture should be built upon a foundation of fostering healthy and respectful relationships for all.

6.3 Every member of the community has a part to play in ensuring that abusive behaviour is never acceptable and that everyone contributes to creating this safe environment.

6.4 Students should feel able to share their concerns with staff in an open and non-judgemental environment and that staff are trained to develop these trusting relationships.

6.5 Staff should encourage positive qualities in students and encourage them to attain their goals and ambitions, realising that supervised activities offered to students might give them protection against abusive behaviour.

6.6 Staff should respond to cases of child-on-child abuse promptly and appropriately. This involves informing the school's safeguarding team and reporting on CPOMS so that they can spot concerning trends and patterns in behaviour and offer additional support to students. This is achieved via weekly safeguarding/pastoral meetings where attitudes that underlie such abuse are challenged, involving cases both within and beyond the classroom. Attendees at the safeguarding meetings include the Deputy Head (Safeguarding & Inclusion), Deputy Head (Pastoral), Lead Nurse, Lead Counsellor, SENDCo, Head of Lower School, Head of Middle School, or the Deputy Head (Senior School) as required.

Multi-agency working

7.1 The school actively engages with its Local Safeguarding Children Partnership in relation to child-on-child abuse and works closely with the London Borough of Hammersmith & Fulham Children's Services, the police and other relevant agencies in accordance with the Local Safeguarding Children Partnership's procedures, as well as with other schools. When relevant, the school will respond to concerns as instructed by the Children Social Care (CSC) or the Police.

7.2 These are essential relationships in preventing, early identifying, and appropriately handling child-on-child abuse. It is also important for students and staff to understand the referral pathways which are available in the area and for students to be able to access them quickly. This information is available on the student portal.

7.3 Working together with local agencies is, furthermore, crucial in supporting and helping to inform the local community about the school's response to child-on-child abuse, as well as allowing for an understanding of any underlying trends and patterns of behaviour which are emerging in this wider context.

7.4 Often, child-on-child abuse cases are complex and where the incident cannot be managed by the school itself, it is imperative that effective partnership working is involved, especially when wider safeguarding concerns exist.

General principles

8.1 All concerns and allegations of child-on-child abuse must be handled promptly, sensitively, and appropriately. These responses can have a significant impact on the environment of a school.

All responses should:

- Include a thorough investigation of the concerns and allegations in the wider context in which they occur
- Assess whether it is appropriate for the police or Children's Services to carry out this process
- Treat all young people involved as at potential risk. This should also include the young person who is allegedly responsible for the abuse as they may have unmet needs and be at risk themselves
- Ensure that a safeguarding response is in place for both the child who has allegedly been abused, and anyone who is alleged to be responsible for it and understand that sanctions may need to be applied for the latter
- Include clear record-keeping, preserving accounts of events and actions taken.

They should take into account:

- That the abuse may indicate wider safeguarding concerns for all those involved and address the impact of wider contexts, such as peer groups, family, school environment, local community, previous experiences of crime and victimisation and the young person's online presence
- the complexity of the interplay between power, choice and consent and consider that a young person cannot consent if their choices are being limited
- the Deputy Head (Safeguarding & Inclusion), who is the Designated Safeguarding Lead (DSL), will, where appropriate, discuss referrals with the young person and parents/carers. This, however, may not be possible if a referral has to be made immediately, and information may be shared without consent if necessary to protect a child
- the school should manage the young person's expectations of information sharing and keep them and their parents/carers informed of developments where appropriate and safe to do so
- significantly, the wishes of the young person who has allegedly been abused must be taken into account and they should be given as much control as is reasonably possible over decisions regarding an investigation and how they will be supported.

What should be done if a child is suspected of being at risk of being abused by their peers, or that a young person may be at risk of abusing, or is abusing their peers?

9.1 All the above factors should be discussed with the Deputy Head (Safeguarding & Inclusion)/DSL immediately who will adhere to the School's Safeguarding (Child Protection) Policy and then agree a course of action.

9.2 Where a young person is suffering, or is likely to suffer, an immediate referral to Children's Services should be made (and to the police, if appropriate).

9.3 Anyone can make a referral. If it is not made by the Deputy Head (Safeguarding & Inclusion)/DSL, they should be informed as soon as possible that a referral has been made - see Safeguarding (Child Protection) Policy.

9.4 If a child speaks to a member of staff about child-on-child abuse, the member of staff should listen in a non-judgemental fashion and offer understanding and sensitive responses. See Safeguarding (Child Protection) Policy. The member of staff should make a record of the disclosure as soon as possible, in CPOMS if possible or in writing for later addition to CPOMS.

How will the school respond to concerns about, or allegations of, child-on-child abuse?

10.1 Staff should always report concerns to the Deputy Head (Safeguarding & Inclusion)/DSL, or in their absence a Deputy Designated Safeguarding Lead (DDSL).

10.2 The Deputy Head (Safeguarding & Inclusion)/DSL will discuss with the reporting member of staff and, where necessary, take immediate steps to ensure the safety of all young people affected.

10.3 Where allegations relate to the sharing of images of children online, staff should find the Deputy Head (Safeguarding & Inclusion)/DSL or DDSL immediately and give a verbal report, to be followed by a written CPOMS report. The Deputy Head (Safeguarding & Inclusion)/DSL should seek specialist help, which will always involve the Police, in preventing the images spreading further. The Police will be contacted in all cases when there is suspicion of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes having been created, manipulated or shared. Staff will be given training and reminders about how to deal with images found on devices; guidelines are: **Never** view, copy, print, share, store or save the imagery themselves, or ask a child to share or download – **this is illegal**. Where content is found on the school network, the Online Safety Officer should be notified, and early action taken to isolate and minimise the distribution of the images. It should be noted that due to screen-grabbing and the speed of social media in particular, no assurances can be given that online content can be removed completely.

10.4 If a member of staff has already viewed the imagery by accident (e.g., if shown by a young person as part of a disclosure), this should be reported to the Deputy Head (Safeguarding & Inclusion)/DSL who will offer guidance and support. **Do not** delete the imagery or ask the young person to delete it. **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the Deputy Head (Safeguarding & Inclusion)/DSL. **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers. **Do not** say or do anything to blame or shame any young people involved. **Do** explain to them that you need to report it and reassure them that they will receive support and help from the Deputy Head (Safeguarding & Inclusion)/DSL.

10.5 In such cases, the Deputy Head (Safeguarding & Inclusion)/DSL should use their professional judgement to assess the nature and seriousness of the alleged behaviour and determine whether the alleged behaviour should be dealt with internally or whether external support is required (from The Internet Watch Foundation, for example).

10.6 In borderline cases, the Deputy Head (Safeguarding & Inclusion)/DSL may want to consult with Children's Services and the Hammersmith and Fulham LADO and other relevant agencies in accordance with the Local Safeguarding Children Partnership's procedures on a no-names basis, to plan the appropriate response.

10.7 Where the Deputy Head (Safeguarding & Inclusion)/DSL believes, or suspects, that a young person is being subjected to abusive or violent behaviour, they should immediately contact Children's Services and/or the police, and certainly within 24 hours of them being made aware of the alleged behaviour. Where a young

person is believed to be in immediate danger, the member of staff should dial 999 and seek emergency response.

10.8 The Deputy Head (Safeguarding & Inclusion)/DSL will discuss the allegations with the external agency and then agree a plan which may include:

- management of the case internally but with help from external agencies, where appropriate
- the school will participate in local multi-agency audits to evaluate the efficacy of joint safety plans
- the school contributing to an inter-agency early help assessment to enable the young person's and those of their families, needs to be targeted
- refer the young person(s) to Children's Services for a Section 17 (Child in Need) or a Section 47 (Child Protection) statutory assessment as appropriate
- report alleged criminal behaviour to the police. There may be some circumstances where it is not appropriate to report such behaviour, however, and all cases will be treated on an individual basis, and in conjunction with their wider context.

Safety plans

11.1 The school will always carry out a safety plan with regard to:

- any young person who is considered to have behaved abusively or violently
- any child who has allegedly been abused directly or affected by the alleged abusive or violent behaviour by a peer
- any young person who is deemed at risk from another young person in the judgement of the Deputy Head (Safeguarding & Inclusion)/DSL.

11.2 If a child is considered to have behaved inappropriately, but not in a violent or abusive fashion, the Deputy Head (Safeguarding & Inclusion)/DSL would apply their professional judgement in the context of the young person's individual needs and context, to ascertain whether it would be appropriate to contact Children's Services and carry out a Safety Plan.

11.3 If there is any concern that a young person may be being abused by another young person, a consultation with Children's Services should be carried out.

11.4 Where other young people have witnessed alleged abuse or violent behaviour, the Deputy Head (Safeguarding & Inclusion)/DSL should assess the risk to them and consider whether a safety plan would be appropriate for their needs.

Sharing of information, data protection and record keeping

12.1 Clear, accurate and timely record-keeping is central to good safeguarding practice. CPOMS provides the database used by the school and all records should be added to the database at the earliest opportunity.

12.2 Where a record is made by any other means, in writing or digitally, it should be added to CPOMS as soon as practically possible and advice should be sought from the Deputy Head (Safeguarding & Inclusion)/DSL, DDSL or school data protection advisor regarding the safe disposal of written records or accounts recorded digitally other than in CPOMS.

12.3 The Deputy Head (Safeguarding & Inclusion)/DSL will analyse CPOMS data for patterns and provide anonymised termly trend reports to Governors, to support oversight as recommended by Farrer (2024).

12.4 When responding to allegations of abuse, or concerns about abuse, the school will:

- always consult external agencies in order to best decide how to share information about the concerns or allegations affecting students, their parents, staff and other individuals involved

- record all necessary information for all the participating agencies and respond to the concerns or allegations within a safeguarding context
- keep a record of the legal purpose for sharing the information with any third party, including external agencies, is kept in the data protection audit
- ensure that the third party has agreed to handle the information securely and only use it for the agreed legal purpose
- consult, and act in accordance with, its safeguarding and data protection duties, including those set out in *Working Together to Safeguard Children (March 2026)* and *HM Government Advice on Information Sharing: advice for practitioners providing safeguarding services (May 2024)*.

12.5 The school recognise that this will contain sensitive personal data and it will be treated accordingly in line with the school's Staff Data Protection Policy and Privacy Notices.

Disciplinary action

13.1 The school may want to consider disciplinary action for any young person involved in child-on-child abuse; however, if there are police proceedings underway, or they are pending, it is crucial that the school works in partnership with the police and/or Children's Services.

13.2 Even if external agencies are not involved, the school may still need to consider sanctions in order to ensure positive behaviour in the future. This may include the young person taking responsibility for their actions and realising the gravity of them, thus demonstrating to other students that child-on-child abuse will never be tolerated.

13.3 Before deciding on any action, the school will always consider its duty to safeguard all young people in its care and will take into account any special education needs or disabilities.

13.4 It should also take into account the underlying reasons for any abusive behaviour, the severity, and the causes of any abuse suffered by a young person.

13.5 Expulsion will only be considered as a last resort and in cases where the safety and wellbeing of other students is at risk.

13.6 In the case of an expulsion, due care must be given when sharing information with a student's new school in order to allow students in the receiving school to be protected, as well as the leaving student.

13.7 However, disciplinary interventions rarely solve child-on-child abuse and so the school's first resort should be to wider actions and to what can be learned from such cases in the school's future planning and behavioural strategies to combat abuse.

How can a school continue to seek to improve its approach to contextual safeguarding?

14.1 The school should continue to work to embed its approach to contextual safeguarding by involving the whole school community in its strategies and approach.

14.2 It should regularly review its practices by asking such questions as:

- What protective factors and influences exist in school to prevent child-on-child abuse and how can the school strengthen and highlight them?
- Does the school's physical environment and the students' journeys to and from school contribute to this abuse and how can the school mitigate this risk?
- How can the school mitigate the risk posed by the online environment and encourage a positive and safe use of digital technology?
- Do wider gender norms, equality issues and/or societal issues contribute to the abuse?

- What was the relationship between the abuse and the cultural norms between staff and students and how can these be evaluated and addressed in the future?
- Does the abuse indicate a lack of staff training in particular areas and how can these needs be met?
- How have similar cases been handled in the past? What effect have they had, and what has been learned from them?
- Are distinct patterns and trends emerging from the way in which the school handles these cases which can then be fed into future staff training?
- Are these issues occurring in other local schools and is there the need for a multi-agency response to them?
- What has the school learned from past cases which can be addressed via the PSHE/RSE curriculum, and should it be improving its provision in terms of education in matters of consent, respect, equality, avoiding victim-blaming narratives, etc?
- Are there lessons to be learned from the way in which the school engages with parents concerning child-on-child abuse cases?
- Have certain types of young people been highlighted by cases of abuse and should the school be working with them to build confidence and teaching them how to identify and manage child-on-child abuse?
- Should the school have intervened earlier and in a different manner?
- Has the student' voice been heard with regard to developing an on-going strategy to avert child-on-child abuse?

14.3 Answering these questions feeds into the school's child-on-child on-going response which is be reviewed on a case-by-case basis.

14.4 The school will work with the local agencies (where necessary) to deliver on this plan as part of its wider approach to contextual safeguarding.

Review

15.1 This policy will be reviewed annually (and at any other time during the course of the year as necessary) to ensure that it consistently addresses the risks to which students are being, or may be, exposed. Staff and students will be involved in the review of the policy in order to inform the assessment of the impact and effectiveness of the policy during the previous year.

Appendix 1: Definition of sexual violence

Updated to reflect KCSIE 2026 and current HSB practice, including references to AI-generated abuse and sextortion risks.

Extract from Part 5 Keeping Children Safe in Education (KCSIE)

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it **can happen both inside and outside of school/college**. Sexual violence is referred to in this document in the context of child-on-child sexual violence in the form of 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. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault)
- **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. (NOTE – 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.

It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way. Further information can be found at Rape Crisis.

PSHE/RSE Teaching about consent from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice.

- • 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.

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent

Sexual harassment

When referring to sexual harassment the school means ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When the school references sexual harassment, it does so 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.

Whilst not intended to be an exhaustive list, 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
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence¹³⁸)
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.¹³⁹ It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges (see link in para 1.4 and in toolkits list in Appendix 2). Taking and sharing nude photographs of U18s is a criminal offence
 - sexualised online bullying
 - unwanted sexual comments and messages, including on social media
 - sexual exploitation; coercion and threats
 - coercing others into sharing images of themselves or performing acts they’re not comfortable with online
 - the use of deepfake imagery in the context of any of the above.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful sexual behaviour (HSB)

Children’s sexual behaviour exists on a wide continuum, ranging 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. A useful umbrella term is “harmful sexual behaviour” (HSB). The term has been widely adopted in child protection and is used in this advice. **HSB can occur online and/or face-to-face and can also occur simultaneously between the two.** HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the 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, for example, if the older child is disabled or smaller in stature. It should also be recognised that HSB can occur within groups of children,

where collective behaviour creates the capacity to overpower others, both physically and emotionally. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in Annex B.

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.

HSB **can**, in some cases, progress on a continuum.

Appendix 2: Support Services

Support for victims

Local authority children's social care and the police will be important partners where a crime might have been committed. Schools and colleges may also find the following resources helpful:

- Barnardo's - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services
- Lucy Faithfull Foundation - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline
- Marie Collins Foundation – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse
- NSPCC - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse
- Rape Crisis - National charity and the umbrella body for their network of independent member Rape Crisis Centres - Provide and signpost to a range of services to support people who have experience 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 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
- UK Safer Internet Centre - Provides advice and support to children, young people, parents, carers and schools about staying safe online
- 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.

Online concerns can be especially complicated, and support is available from:

- The UK Safer Internet Centre 0344 381 4772 and helpline@saferinternet.org.uk
- Internet Watch Foundation (IWF)
- Childline/IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online
- UK Council for Internet Safety (UKCIS) Sharing nudes and semi-nudes: advice for education settings working with children and young people
- National Crime Agency's CEOP Education Programme
- LGfL 'Undressed'
- Cyber Choices programme [Cyber Choices - National Crime Agency](#).

Further advice and support can be found in KCSIE Part 5 and Annex B.

Toolkits

- Ask AVA - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls

- Brook's Sexual Behaviours Traffic Light Tool - A tool which uses a traffic light system to categorise, identify and respond to young people's sexual behaviour
- Lucy Faithful Foundation HSB Behaviour Toolkit – provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse
- NSPCC - Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children
- NSPCC - Resources which help adults respond to children disclosing abuse.
- Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire - Child-on-Child Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to child-on-child abuse.

Confidential Support for parents/carers

- CEOP Thinkuknow advice for parents: Advice/resources on how to approach and deal with concerns about what children may be doing online
- Childnet: Advice for parents and carers to keep children safe online - Advice and resources to help parents and carers keep children safe online
- How Can I Help My Child? - Marie Collins Foundation – Sexual Abuse Online
- Parentsafe - London Grid for Learning - Detailed advice/resources covering various issues such as online safety, apps, and how to report concerns
- Parentzone - Provides expert information and resources to help make the internet work for families.

APPENDIX 3: SAMPLE SAFETY PLAN

Include digital safety steps (blocking, reporting, secure evidence capture) and bystander responsibilities, in line with KCSIE and NSPCC guidance.

How can I try and ensure I will not be at risk of further abuse/unpleasant behaviour?

- Try to avoid situations/groups/individuals who make me feel uncomfortable
- I will 'check in' regularly with my Tutor or Head of Year and report any concerns
- I will report any digital activity which is concerning or unsolicited
- I will not join in digital interactions which could be undermining
- I will only use digital, including AI, resources and tools approved via the school's Online Resources Approval
- I will block individuals who are contacting me in a way that makes me feel unsafe and will report inappropriate behaviour through the relevant platforms and to the school
- I will save evidence of concerning online behaviour by taking screenshots, saving messages, usernames, dates, times and URLs where appropriate, and will share these with a trusted adult without forwarding harmful content
- I will review and strengthen my privacy settings on social media, gaming platforms and messaging apps. If I don't know how to do this, I will ask for help
- I will not respond to abusive, threatening or provocative messages online
- If content involving me has been shared online without my consent, I will tell a trusted adult immediately so appropriate reporting and removal procedures can be followed.

Do I have any mental health concerns or symptoms that make it harder to stay safe? How can I help with these?

- I will share my concerns with my parents/guardians (where possible)
- I will see a member of the Wellbeing team for weekly support
- I will talk to Children's Services – as appropriate

What can I do right now that will help me feel safe? (coping strategies)

- Talk to friends
- Take myself away from social groups to a quiet place
- Practise music/go to the library/exercise
- Avoid participation in online behaviour which could leave me vulnerable to unpleasant comments/behaviour and disable social media accounts that concern me
- Use wellbeing apps, access useful websites or telephone organisations who offer support (see below)
- Block and report online accounts responsible for bullying, harassment or unwanted contact.
- Take screenshots or save evidence if online abuse occurs, then seek support from a trusted adult rather than dealing with it alone
- Use platform safety tools to control who can contact me, view my content or add me to groups. Ask for help if I am unsure how to do this.

Who can I reach out to for help?

- My tutor
- My Head of Year
- The Deputy Head (Pastoral) Care
- The Deputy Head (Safeguarding & Inclusion)
- Members of the Wellbeing Team
- Childline 0800 1111
- MIND 0300 123 3393
- SAMARITANS 116 123

Long Term Support Plan

- To build resilience via supportive friends/influences
- Arrange extra support, maybe via the school counselling service or external therapist if this becomes necessary
- To move away, physically, digitally and emotionally, from those who have been abusive

What can I do if I am worried about someone else?

- If I have overheard something, or a disclosure has been made to me, I will talk to a trusted adult such as the DSL or DDSL
- I will take all concerns about another student's safety seriously, whether they occur in person or online
- I will not ignore, encourage, share, like, comment on, or participate in bullying, harassment, discrimination, sexual harassment or abusive behaviour
- I will report concerns about another student's safety to a trusted adult, even if they ask me not to tell anyone. I understand that keeping someone safe is more important than keeping a secret
- Where it is safe to do so, I will encourage the student to seek support from a trusted adult and offer to accompany them
- I will not put myself at risk by confronting someone who is behaving abusively
- If I witness harmful online behaviour, I will preserve evidence where appropriate and report it through school safeguarding procedures
- I will not forward, save, redistribute or engage with harmful, abusive or non-consensually shared content
- If I become aware of a breach of this safety plan, I will report it to a member of staff immediately
- As a friend, I will help support agreed safety measures, including encouraging attendance at support meetings, helping the student access trusted adults, and discouraging involvement in situations that may place them at risk
- I will respect the privacy and dignity of the student and will not discuss safeguarding concerns with other students unless advised to by staff
- I will seek support for myself if I am affected by what I have seen, heard or experienced while supporting someone else.