

INVICTUS

Education Trust

Anti-Child-on-Child Abuse & Bullying Policy

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Document Control and Version Control

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1. Our Mission, Vision and Values



Mission

'Excellence every day, unlimited ambition and transforming lives'



Vision

'To create a community of inclusive schools where people choose to learn with us, work with us and belong with us, so that everyone succeeds'



Values

- Respect
- Resilience
- Relationships

2. Statement of Intent

Statement of Intent: Child-on-Child Abuse and Anti-Bullying

The Invictus Education Trust is fully committed to safeguarding and promoting the welfare of all children and young people. We expect every member of staff across our schools to share this commitment.

We recognise the **serious and lasting impact** that child-on-child abuse can have. Every child and young person has the right to access a learning environment that is free from fear, abuse, and discrimination. When this right is compromised by the actions or behaviours of peers, we are duty-bound to take prompt and effective action.

Bullying in any form is not tolerated and will never be accepted within our school communities. We actively promote a culture of care and kindness, where words and actions are used to support and affirm one another.

We welcome all children and young people into a warm, nurturing environment, providing a platform of support to help them thrive and flourish—regardless of age, ability, culture, race, language, religion, gender identity, or sexual identity. Kindness and care are at the heart of our daily practice, ensuring everyone can learn in a happy and secure atmosphere.

Every student is respected for their personal worth and dignity. We encourage all students to develop a caring attitude towards others and to respect and accept people from every background. Self-discipline and personal responsibility are promoted, empowering students to make positive decisions and take responsibility for their actions.

Our aim is to foster a school community where bullying is not tolerated, and students feel safe and confident to report concerns. We are committed to embedding an anti-bullying message throughout our schools, encouraging all individuals to act with acceptance, care, and consideration at all times.

Compliance:

This policy is written in accordance with:

- Keeping Children Safe in Education (September 2023) – statutory guidance for schools and colleges.
- Working Together to Safeguard Children (March 2018) – guidance for inter-agency working to safeguard and promote the welfare of children.

School leaders will also follow the procedures set out by the relevant local safeguarding partnerships:

- Dudley Safeguarding People Partnership
- Staffordshire Safeguarding Children Board

3. Legal Framework & Guidance

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

- **Education Act (2002)** – Section 175 places a duty on schools to safeguard and promote the welfare of children.
- **[Keeping Children Safe in Education \(KCSIE\) – September 2025](#)** – Statutory guidance for schools and colleges on safeguarding children.
- **Working Together to Safeguard Children (2018)** – A guide to inter-agency working to safeguard and promote the welfare of children.
- **What to Do if You're Worried a Child is Being Abused (2015)** – Advice for practitioners.
- **Information Sharing: Advice for Practitioners Providing Safeguarding Services (2018)** – Guidance on effective information sharing.

- **Guidance for Safer Working Practice for Adults Who Work with Children and Young People in Education Settings (2019).**
- **The Data Protection Act (2018)** – Including the UK GDPR, relevant to the handling of personal data.
- **Serious Crime Act (2015)** – Particularly in relation to child sexual exploitation and gang-related activity.
- **Teaching Online Safety in Schools (2019)** – Guidance to support teaching Children about online safety.
- **UKCIS Education for a Connected World Framework (2018)** – Supporting digital resilience and online behaviour.
- **The Prevent Duty (2015)** – Schools’ duty to prevent children from being drawn into terrorism.
- **Sexual Offences Act (2003)** – Including offences relevant to child-on-child abuse.
- **Preventing Youth Violence and Gang Involvement (2013)** – Guidance for schools on identifying and responding to gang-related

4. Scope of this Policy

- This policy defines a ‘child’ or ‘pupil’ as anyone under the age of 18 years or any learner of any age on the School roll.
- This policy applies to all members of our staff, including all permanent, temporary and support staff, trustees, local governors, volunteers, contractors and external service or activity providers. This policy must be read in conjunction with the Safeguarding and Child Protection Policy.
- The trustees, local governors, senior leadership team, and all staff are committed to the prevention, early identification, and appropriate management of child-on-child abuse (as defined below) both within and beyond the School. In this policy, the term *staff* applies also to all volunteer staff members.

5. What is Child-on-Child Abuse?

For the purposes of this policy, child-on-child abuse is defined as any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, and within children’s relationships (both intimate and non-intimate), friendships and wider peer associations.

We recognise that it is statistically more likely that girls will be victims of child-on-child abuse and that boys will statistically be more likely to be perpetrators and that child-on-child abuse can be perpetrated by the same gender, one child or a group of children and that all child-on-child abuse is unacceptable and will be taken seriously and never tolerated.

Child-on-child abuse can take various forms, including, but not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Abuse in intimate personal relationships between peers
- Financial Abuse (Including fraud)
- 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 violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, (physical, verbal and online) such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- Consensual and non-consensual sharing of ‘nudes’ and ‘semi-nudes’ images and or videos (also known as sexting or youth produced/involved sexual imagery)
- *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 (also a crime)
- 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. What is Contextual Safeguarding?

This policy encapsulates a contextual safeguarding approach, which is about the way that professionals approach child protection when risks occur outside of the family (extra familial harm) thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children’s social care, to create safe spaces in which children may have encountered child-on-child abuse.

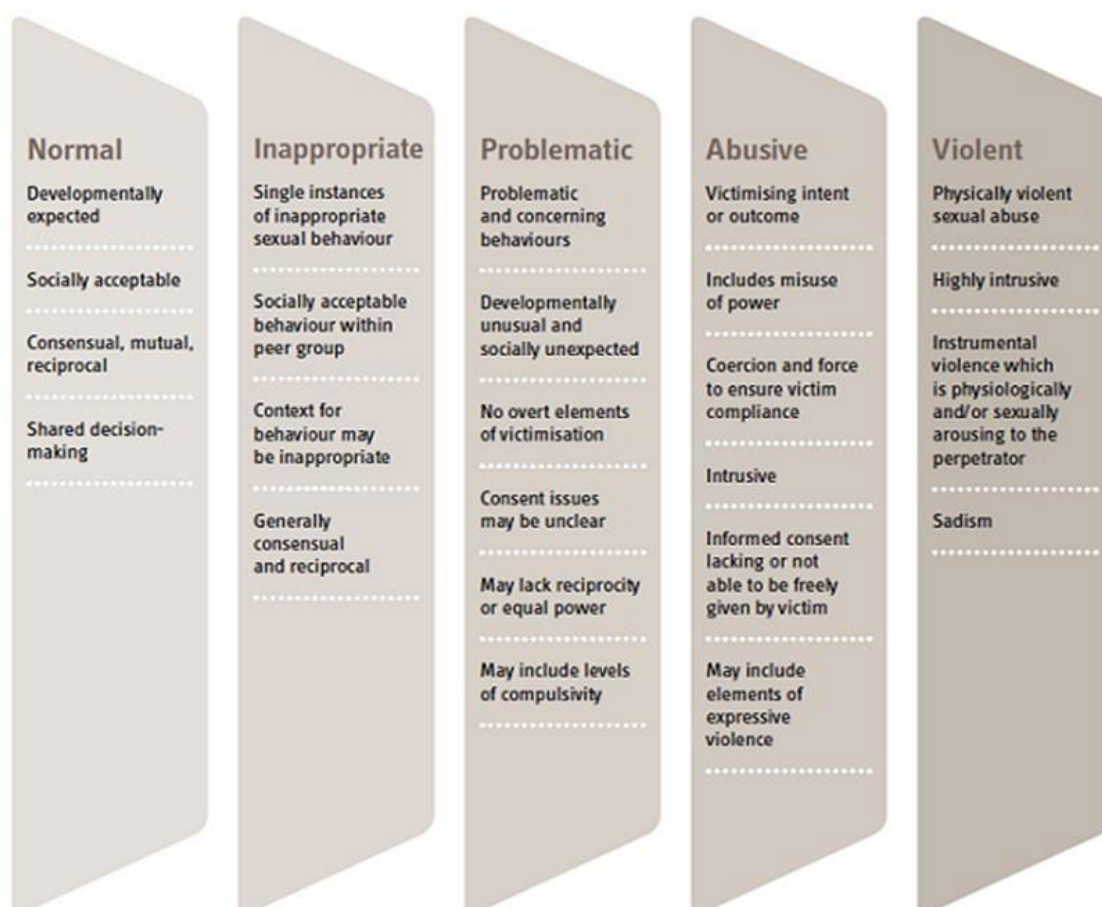
We adopt a whole-school community Contextual Safeguarding approach, which means:

- Being aware of and seeking to understand the impact that these wider social contexts may be having on our Children
- Creating a safe culture in the school by, for example, implementing policies and procedures that address child-on-child abuse and harmful attitudes, promoting healthy relationships and attitudes to gender/sexuality, identifying any risky areas in the school, and conducting training to ensure everyone involved in our community understands that child on child abuse and bullying will never be accepted.
- Being alert to and monitoring changes in Children’ behaviour and/or attendance, and contributing to local child protection agendas by, for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies.

7. Understanding Behaviour

We understand that 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.

Sexual Behaviour- Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a pupil’s sexual behaviour and deciding how to respond to it.



A continuum of children and young people’s sexual behaviours
(Hackett, 2010)

Hackett's continuum relates exclusively to sexual behaviours and is not exhaustive.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum 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 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.

8. Identification of Child-on-Child Abuse

All colleagues must be alert to the wellbeing of Children and to signs of abuse, and will engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, colleagues should be mindful of the fact that the ways in which children will disclose or present with behaviours as a result of their experiences will differ and that there are known barriers to disclosing this abuse to adults.

Colleagues must be aware that children disclosing abuse may not reveal all the incidents of abuse at once and that the trauma of experiencing the abuse can affect memory and recall.

We will regularly review behaviour and pastoral incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

Any child can be vulnerable to child-on-child abuse and colleagues should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, a child disclosing abuse or an image of a child being shared, following which they could become more vulnerable to child-on-child abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family.

Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to child-on-child abuse. Children who are questioning or exploring their sexuality (or perceived to be by their peers) are also particularly vulnerable to abuse by their peers.

Child-on-child abuse may affect boys differently from girls, and this difference may be the result of societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. DSLs have sufficient training on the influence of gender and societal norms to ensure an appropriate, proportionate, safeguarding first approach all to all incidents of child-on-child abuse.

Children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND¹ and additional barriers exist when recognising abuse in children with SEND. These can include:

¹ Jones, L., Bellis MA., Wood S., Prevalence and risk of violence against children with disabilities: a systematic review and meta-analysis of observational studies, 2012: <https://www.ncbi.nlm.nih.gov/pubmed/22795511>

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- i. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration
- ii. The potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs
- iii. Communication barriers and difficulties overcoming these barriers
Some children may be more likely to experience peer-on-peer abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race, or religious beliefs.

9. A Whole School Approach

We actively seek to raise awareness of and prevent all forms of child-on-child abuse by educating our staff, students and parents about this issue.

This includes training staff on the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify, and respond to it. Training involves learning about:

Contextual Safeguarding

The identification and classification of specific behaviours, including digital behaviours.

The importance of taking seriously all forms of child-on-child abuse (no matter how 'low level' they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing or normalized.

Social media and online safety, including how to encourage children to use social media in a positive, responsible, and safe way, and how to enable them to identify and manage abusive behaviour online.

Educating children about the nature and prevalence of child-on-child abuse, positive, responsible, and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider curriculum.

Children are frequently 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 regularly informed about our approach to such issues.

Educating Children – Consent

Educating Children about consent includes teaching the following key legal facts:

- **A child under the age of 13 can never legally consent to any sexual activity.**
- **The age of consent in the UK is 16.**
- **Sexual intercourse or any sexual activity without consent is rape or sexual assault.**

Further, Children should understand:

- **Consent is only valid when an individual has the freedom and capacity to make a choice.**
- **Consent can be withdrawn at any time.**
- **Consent to one activity does not imply consent to another, nor does it imply ongoing consent.**
- **Each person has the right to decide which activities they consent to and which they do not.**

These principles are embedded in our curriculum and safeguarding practice to ensure all Children understand their rights and responsibilities regarding consent.

Engaging parents on these issues includes:

Talking to them, about what they perceive to be the risks facing their child and how they would like to see the school address those risks

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Supporting the on-going welfare of Children by drawing on multiple resources that prioritise student mental health, and by providing a tiered mental health provision to address varying levels of mental health issues.

Wider context includes:

Working with associate governors, senior leadership team, and all staff, children and parents to address equality issues, to promote positive values, and to encourage a culture of, acceptance, 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 fostering a whole-school culture which is founded on the idea that every member of our school community is responsible for building and maintaining safe and positive relationships and helping to create a safe school environment in which bullying, violence and abuse are never acceptable.

Responding to cases of child-on-child abuse promptly and appropriately

Ensuring that all child-on-child abuse issues are reported to the safeguarding team/DSL so that they can spot and address any concerning trends and identify Children who may need additional support.

10. Multi-Agency Working

We actively engage with our Local Safeguarding Partnership in relation to child-on-child abuse, and work closely with, for example, children's social care, the police and other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, and other schools. The relationships that we have built with these partners are essential to ensuring that the school is able to prevent, identify early, and appropriately handle cases of child-on-child abuse.

Local Safeguarding Partners help us to:

- Develop a good awareness and understanding of the different referral pathways that operate in our local area, as well as the preventative and support services which exist
- Ensure that our students can access the range of services and support they need quickly Increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our students.

We respond to each incident individually and proportionately. We actively refer concerns and allegations of child-on-child abuse where necessary to children's social care, the police and MASH and other relevant agencies in accordance with the Local Safeguarding Partnership's procedures. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the alleged incident cannot appropriately be managed internally by the school itself) to try to address the issue alone – it requires effective partnership working.

11. Response to Concerns or Allegations

All concerns and allegations of child-on-child abuse are handled sensitively, appropriately, proportionately, and promptly using professional judgement and listening to the wishes of the students involved and their parents. Any response will:

Include a thorough investigation of the concern or allegation, and the wider context in which it may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident. (It may be appropriate for the police and/or children's social care to carry out this investigation).

Treat all Children involved as being at potential risk – while the pupil allegedly responsible for the abuse may pose a significant risk of harm to other Children, they may also have considerable unmet needs and be at risk of harm themselves.

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Consider that the abuse may indicate wider safeguarding concerns for any of the Children involved and consider and address the effect of wider societal gender norms and sociocultural contexts.

We will consider what changes may need to be made to these contexts to address the student/students needs and to mitigate risk. We also consider the potential complexity of child-on-child abuse and of student's experiences, and consider the interplay between power, choice, and consent. While students may appear to be making choices, if those choices are *limited*, they are not consenting, and how the views of the student/student's are affected.

Unless it is considered unsafe to do so (for example, where a referral needs to be made or a risk assessment put in place immediately), the DSL/appropriate member of the safeguarding team will discuss the proposed action with the student/student's and their parents/carers and obtain consent to any referral before it is made where possible.

We will manage the pupil's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to consider the wishes of any pupil who has allegedly been harmed, and to give that student as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

We will ensure that a safeguarding response is in place for both the pupil who has allegedly experienced the harm, and the pupil who has allegedly been responsible for it (and the additional sanctioning work may be required for the latter).

What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

If a colleague thinks, for whatever reason, that a student may be at risk of or experiencing abuse by their peer(s), or that a student may be at risk of abusing or may be abusing their peer(s), they should discuss the matter with their DSL as soon as possible to explain their concern and register a note of concern on the internal referral system.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately.

Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made in line with the Safeguarding and Child protection policy.

If a student 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 pupil and use open language that demonstrates understanding rather than judgement without promising confidentiality. For further details please see the procedures set out in the Safeguarding and Child Protection policy.

How will we respond to concerns or allegations of child-on-child abuse?

We will reassure the student that we have listened to them, believe them and are taking the incident seriously. We will ensure that they feel safe and supported.

The DSL will discuss the concern or allegation with the member of staff who has reported it and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. Where any concern or allegation indicates that indecent images of a child or children may have been shared online, the DSL will consider what urgent action can be taken in addition to the actions and referral duties set out in this policy. See the Youth involved sexual imagery section below to seek specialist help in preventing the images spreading further and removing the images from the internet.

The Internet Watch Foundation (IWF) has a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police. Colleagues

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should not view or forward any illegal images of children but must instead confiscate the device and take it directly to the DSL or Deputy and follow the UKCIS guidance on sharing nudes.

DSLs will always use their professional judgement to assess the nature and seriousness of the alleged behaviour (in line with statutory definitions) and determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL will consult with children's social care or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL should contact children's social care and/or the police immediately and, in any event, within 24 hours of the DSL becoming aware of the alleged behaviour.

We will ensure that information is recorded on the safeguarding system alongside any discussion outcomes, decisions and rationale. The DSL will discuss the concern(s) or allegation(s) with the agency and agree on a course of action.

The DSL will always refer to the police if there are aggravating factors:

- If the incident involves an adult (over 18)
- If there are concerns about the capacity to consent (including SEND)
- Images show atypical sexual behaviour for their development stage or abusive, violent, or harmful acts
- Images show sex acts with a child under age 13
- The disclosure places the pupil (or any child) at risk of imminent harm (self-harm, exploitation, harmful response from home etc).

12. Risk Assessment & Safety Plans

We will carry out a safety plan in respect of:

Any Children alleged to have been involved in an incident of sexual violence and on a case-by- case situation for any pupil involved in an incident of sexual harassment

Any pupil who is alleged to have behaved in a way that is abusive or violent or harmful.

Where it is alleged that a pupil has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgment – based on the particular concern or allegation raised, and the needs and circumstances of the individual children in question – to determine whether it would be appropriate to contact children's social care, and to carry out a safety plan.

Careful judgment and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult risks actual harm to another student. Consultation is recommended with children's social care if there is any doubt about this.

Careful consideration will also be given to a range of factors including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring.

Where other Children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

13. Information Sharing, Data Protection & Record Keeping

When responding to concerns or allegations of child-on-child abuse, we will:

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Always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern or allegation with the pupil(s) affected, their parents, relevant staff, and other appropriate individuals.

Record the information that is necessary for the school and other relevant agencies (where they are involved) to respond to the concern or allegation and safeguard everyone involved including decisions and rationale.

Keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and

Be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in *Working Together to Safeguard Children* and the HM Government advice on Information Sharing.

14. Disciplinary Action

We will consider whether disciplinary action may be appropriate for any pupil involved in child-on-child abuse linked into the behaviour policy. In addition, if there are police proceedings underway, or there could be, it is critical that we work in partnership with the police and children's social care.

Where a matter is not of interest to the police or children's social care, school leaders will still consider what is the most appropriate action to take to ensure positive behaviour management and the safety of all Children.

Disciplinary action is appropriate to:

- Ensure that the student(s) involved take responsibility for and realise the seriousness of their behaviour
- Demonstrate to students and others that child on child abuse is not acceptable and will never be tolerated
- Ensure the safety and wellbeing of other students.

These considerations must be balanced against any police investigations, children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns.

Before deciding on appropriate action we will always consider our duty to safeguard all students in its care from harm; the underlying reasons for a student's behaviour; any unmet needs, or harm or abuse suffered by the pupil; the risk that the pupil may pose to other Children; and the severity of the child-on-child abuse and the causes of it.

School leaders will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves, alternative provision or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. For example, action may still need to be taken by the school in relation to other students who have been involved with and/or affected by child-on-child abuse.

Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of students. In the event of any managed move, consideration must be given to sharing information with the receiving school regarding the child-on-child abuse in order to allow best protection of children in the new school.

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.

Parental Impact Assessment

As part of the policy review process, consideration has been given to whether the policy, or any changes to it, has a direct impact on parents and carers. This includes assessing whether changes affect parental responsibilities, required actions, communication processes, or understanding of Trust or school practices.

Decision:

The Trust Executive Team has determined that parental communication is:

- ✓ Required for this policy. Method of communication will be via Arbor.

15. Appendices

Appendix I- Procedure for Youth Involved Sexual Imagery (Sexting, Nudes or Pics)

We recognise that 'youth involved' and 'sexting' are not terms that children and young people generally use, and it is important for colleagues in our schools to understand the language that is used by children and young people when discussing this issue with them or creating a policy.

Definitions:

Youth involved sexual imagery best describes the practice because:

- Youth involved* includes children sharing images that they, or another child, have created of themselves
- Imagery* covers both still photos and moving videos (and this is what is meant by reference to imagery throughout the policy)

Types of incidents that are covered by this policy:

- A child creates and shares sexual imagery of themselves with a peer (also under the age of 18)
- A child shares sexual imagery created by another child with a peer (also under the age of 18) or an adult
- A child is in possession of sexual imagery created by another child

Types of incidents that are not covered by this policy:

- The sharing of sexual imagery of children by adults constitutes *child sexual abuse* and the school will always inform the police
- Children sharing adult pornography or exchanging sexual texts which do not contain imagery
- Sexual imagery downloaded from the internet by a child and not shared

Education will be inclusive, age appropriate, and provide Children with the opportunity to discuss and ask questions. Where education does consider the legal issues associated with youth involved sexual imagery, it should consider the nature of the legislation and likely police responses, rather than simple declarations of illegality.

When addressing the issue of children and young people sharing sexual images or videos of themselves or peers (often referred to as "sexting" or "youth-produced sexual imagery"), it is essential that our approach is **safeguarding-led, non-judgemental, and trauma-informed**.

While online safety education often focuses on telling children not to create or share such images because it is illegal or risky, this approach can be problematic and counterproductive. We recognise that:

1. **Messages that focus solely on illegality or blame may discourage children from seeking help.** A child who has been coerced, exploited, or abused may feel unable to disclose what has happened for fear of punishment or shame.
2. **Such messaging can unintentionally contribute to victim-blaming**, reinforcing the idea that the child is at fault for the abuse they have experienced.
3. **The most harmful behaviours often arise not from the creation of the image**, but from the **non-consensual sharing, coercion, or threats** made by others. Our response therefore focuses on the **abuse of**

power, consent, and the criminality of distribution, rather than placing blame on the child who created the image.

Our educational and safeguarding approach emphasises:

- **The importance of consent**, personal boundaries, and respectful relationships.
- **The legal framework**, including that:
 - A child under 13 can never legally consent to any sexual activity.
 - The age of consent in the UK is 16.
 - Sexual activity without consent is a criminal offence.
 - It is illegal to possess, share, or distribute indecent images of anyone under 18—even if the image is self-generated.
- **Support over punishment**: Children who have shared images of themselves will be treated as potential victims in need of support, not as offenders.
- **Clear consequences for those who exploit or harm others**, including those who share images without consent or use them to threaten, shame, or control.

This approach aligns with guidance from the UK Council for Internet Safety (UKCIS), *Keeping Children Safe in Education*, and *Working Together to Safeguard Children*, and ensures that our response is both legally compliant and rooted in best safeguarding practice.

Disclosure:

Any disclosure by a pupil will be taken very seriously. A pupil who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in the School is a last resort, and they may have already tried to resolve the issue themselves.

Colleagues must recognise that they may not have the full set of information from the initial disclosure because of embarrassment, fear of peer retaliation or adult judgement or because of the impact of experiencing the trauma on memory. This does not mean that what was shared was untrue.

Handling Incidents:

When an incident involving youth involving sexual imagery comes to a member of staff's attention:

- The incident will be referred to the DSL/Safeguarding team as soon as possible, certainly that day.
- The DSL should hold an initial review meeting with appropriate colleagues. The DSL will follow the procedures and guidance set out in 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (2020) There will be subsequent **discreet** interviews with the Children involved
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm
- Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately

Any report to the police should be considered against the severity of the concerns and/or allegations, the impact on any child who has allegedly experienced the abuse, and broader context of the production and distribution of the image (for example: was production consensual or coerced? Was sharing consensual? Was production volunteered or requested? What are the ages of the children involved?) [Report Remove Tool](#)

Always refer to the police if there are aggravating factors:

- If the incident involves an adult (over 18)
- If there are concerns about the capacity to consent (SEND)
- Images show atypical sexual behaviour for their development stage or violent acts (harmful in the Brook tool)
- Images show sex acts with a child under the age of 13
- The disclosure places the young person at risk of imminent harm

Depending on the facts of the particular concern or allegation, a report to the police does not necessarily mean that the child will be criminalised.

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However, in the event of coercion, exploitation, further harm, or aggravated behaviours, it is valid for police involvement to result in criminal charge. We will communicate with their police liaison to determine awareness of Outcome 21 recording and its appropriateness in any given incident.

Appendix 2- Bullying Specific Procedures

We will refer to and work within the guidelines set out in the DfE's Preventing and Tackling Bullying.

Definition: (repeated, deliberate harm – likely power imbalance)

For the purposes of this policy, bullying is persistent behaviour by an individual or group with the intention of verbally, physically, or emotionally harming another person or group and includes child-on-child abuse.

Bullying is generally characterised by:

- **Repetition:** Incidents are not one-offs; they are frequent and happen over a period of time.
- **Intent:** The perpetrator(s) means to cause verbal, physical or emotional harm; it is not accidental.
- **Targeting:** Bullying is generally targeted at a specific individual or group.
- **Power imbalance:** Whether real or perceived, bullying is generally based on unequal power relations.

Teasing another pupil because of their appearance, religion, ethnicity, gender, sexual-orientation, home life, culture, disability, or special educational needs are some of the types of bullying that can occur.

“Bullying is picking on someone constantly or leaving them out in certain situations. Cyber-bullying is a form of bullying that takes place online, this could be sending constant hateful messages towards the individual or posting horrible things about them.” – Pupil voice, 5th September 2020.

“Bullying is a constant situation in where a person persistently uses abuse, either emotionally or physically, day in day out. Cyberbullying is online and is also consistent towards others even though it's not face-to-face. It can also be considered as emotional abuse and sometimes physical.” – Pupil voice, 5th September 2020.

Bullying can be acted out through the following mediums:

- Verbally
- Physically
- Emotionally
- Online (Cyber)
- Deliberate Isolation
- Microaggressions
- Disguised compliance

Racist bullying: Bullying another person based on their ethnic background, religion or skin colour. Racist bullying is a criminal offence under the Crime and Disorder Act 1998 and Public Order Act 1986.

Homophobic and Bi-Phobic bullying: Bullying another person because of their actual or perceived sexual orientation.

Transphobic bullying: Bullying based on another person's actual or perceived transgender status. Gender 'variance' or for not conforming to dominant gender roles.

Sexist bullying: Bullying based on sexist attitudes expressed in a way to demean, intimidate, or harm another person because of their sex or gender. Sexist bullying may sometimes be characterised by inappropriate sexual behaviours.

Sexual bullying: Bullying behaviour that has a physical, psychological, verbal, or non-verbal sexual dimension/dynamic that subordinates, humiliates or intimidates another person. This is commonly underpinned by sexist attitudes or gender stereotypes.

Specialist support for schools on sexual and sexist bullying can be found [here](#).

SEND/Ableist Bullying: Bullying behaviour based on another person's special educational needs or disability.

Statutory implications:

Under the *Equality Act (2010)*, we understand that we have a responsibility to eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the act; advance equality of opportunity between people who share a protected characteristic and people who do not share it; and foster good relations between people who share a protected characteristic and people who do not share it.

Under the *Human Rights Act (HRA) (1998)*, we understand that we could have charges brought against it if we allow the rights of children and young people at the School to be breached by failing to take bullying seriously.

Although bullying itself is not a criminal offence, some types of harassment, threatening behaviour and/or communications may be considered criminal offences:

Under the *Malicious Communications Act (1988)*, it is an offence for a person to electronically communicate with another person with the intent to cause distress or anxiety, or which conveys a message which is indecent or grossly offensive, a threat, or information which is false and known or believed to be false by the sender.

The Protection from *Harassment Act (1997)* makes it an offence to knowingly pursue any course of conduct amounting to harassment.

Section 127 of the *Communications Act (2003)* makes it an offence to send, by means of a public electronic communications network, a message, or other matter, that is grossly offensive or of an indecent, obscene or menacing character. It is unlawful to disseminate defamatory information through any media, including internet sites.

Other forms of bullying which are illegal and, therefore, should be reported to police include: violence or assault, theft, repeated harassment or intimidation and hate crimes.

General indicative signs of child on child abuse: (*please note this list isn't exhaustive)

- Becoming anxious or lacking confidence
- Saying that they feel ill in the morning
- Decreased involvement in schoolwork
- Returning home with torn clothes or damaged possessions
- Missing possessions
- Missing dinner money
- Asking for extra money or stealing
- Cuts or bruises
- Lack of appetite
- Unwillingness to use the internet or mobile devices
- Becoming agitated when receiving calls or text messages
- Lack of eye contact
- Becoming short tempered
- Change in behaviour and attitude at home

Although the signs outlined above may not be due to bullying, they may be due to deeper social, emotional or mental issues, so will still be investigated.

Prevention:

Prevention is at the forefront of our *Anti-Child-on-Child abuse (Anti-Bullying) Policy*.

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Staff treat reports of bullying very seriously and never assume that it is 'just banter'. Any disclosure of bullying is reported through the electronic safeguarding system to the DSL. Staff take action immediately; this applies to all staff, not solely teaching staff. Unpleasantness from one pupil towards another is always challenged and never ignored.

Staff respect Children' privacy, and information about specific instances of bullying are not discussed with others in-line with the safeguarding disclosure process, please refer to the safeguarding and child protection policy.

Follow-up support is given to both the alleged victim and alleged bully which is aligned to our monitoring and support process to ensure all bullying has stopped. Staff colleagues follow up with a meeting with those involved to discuss how effectively they felt the incident has been dealt with to inform future practice and to inform the termly review. The Invictus Education Trust: clearly communicates a whole-trust commitment to addressing bullying in the form of staff training and promoting a culture of care and kindness in our everyday practice.

The Invictus Education Trust: seeks to prevent bullying by creating and fostering a climate of mutual respect between learners, for which staff act as role models in their interactions with each other and with learners. This includes teaching, and exemplifying in personal behaviours, Fundamental British Values such as mutual respect and tolerance for others of different faiths and beliefs (or for those without faith or belief).

Understanding about bullying and its prevention is built into:

Our work with learners on Fundamental British Values around mutual respect, and tolerance for others of different faiths and beliefs, or no belief.

All disclosed, reported or witnessed instances of bullying in the school are challenged by a member of staff. All members of the school community are made aware of our Ant bullying- child-on-child abuse Policy. All colleagues receive training on identifying and dealing with the different types of bullying.

All Children are educated on our anti- child-on-child abuse policy, what bullying is and why it happens, what we do to prevent it and the consequences when child on child abuse occurs. We educate Children on the responsibilities of anyone who witnesses bullying and the role of culpability bystanders as well as other roles Children may unintentionally be placed in when bullying/ child-on-child abuse is taking place.

The same information is shared with parents and transitioning Children through transition evenings before they join the school to ensure that our values are understood before Children arrive at the School.

Staff encourage pupil co-operation and the development of interpersonal skills through the use of group work and pair work, group discussions, peer assessment, the collective creation of group 'compacts', and the Enrichment/PSE element of the curriculum which encourages learners to explore together the concepts of mutual respect and tolerance. All types of bullying are discussed as part of the curriculum, and diversity, difference and respect for others is promoted and celebrated through various subject lessons.

Potential victims of bullying are drawn into working groups with children who do not abuse or take advantage of them. Opportunities to extend friendship groups and interactive skills are provided through participation in special events, for example, drama productions, sporting activities and cultural groups. Where potential for bullying is identified the changing and organising seating arrangements in lesson helps to prevent instances of bullying. A safe, supervised place is available for Children to go to at lunch if they are involved in conflict with their peers.

SEND/Ableist Bullying:

Children who are on the SEND register are more prone to bullying than their peers, but this does not mean that all Children with SEND will be bullied. We continually monitor our SEND Children through the SENCO and Head of Learner Experience through regular reviews with the tutor and the learner of their progress.

When a pupil is identified as socially vulnerable because of their SEND we take every precaution to prevent such incidents occurring. These strategies are listed above but with the addition of specific 'peer-awareness' sessions for

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vulnerable Children that allow these Children to express in their own words the impact that their SEND has upon them and generate some empathy from their peers.

In addition to this we recognise that it might be more difficult for some Children with SEND to express their concerns about bullying and so with the enrolment of each new pupil we spend additional time ensuring that they understand the policy, their rights and ensuring that they feel comfortable with the mechanisms for reporting a concern should one arise for themselves or a peer.

Note due to the individual nature of SEND Children these strategies are continually evolving in line with their individual needs and where necessary additional prevention strategies will be put in place.

Procedures for dealing with disclosures of concerns about bullying:

Minor or one off incidents which cause distress and may include: single episodes of rejection, single episodes of nastiness or spite, random acts of aggression or intimidation, mutual arguments, disagreements or fights and isolation (the list is not exhaustive), will still warrant a rigorous process and response. Investigation, consequence and clear guidance will be given to avoid further incidents and an escalation into more serious bullying or child on child abuse behaviours.

When investigating a bullying incident, the following procedures are adopted:

(If a pupil is injured, members of staff take the pupil immediately to the school nurse/first aider for a medical opinion on the extent of their injuries and proceed as advised)

An incident will be recorded on the system to ensure that the DSL and safeguarding team are aware and can monitor that the process is followed in line with the policy.

Statements will be sought from both the alleged victim and the alleged perpetrator, and the school will do everything possible within the new context to establish the most truthful version of events (on the balance of probability). Members of staff seek to reduce the possibility of contact between the Children interviewed, including electronic communication during the process.

A room or safe quiet place is used that allows for privacy during interviews.

A witness' viewpoint is sought when appropriate.

Unless there is a very strong reason not to engage parents, they will be contacted, and the situation explained. Premature assumptions are not made, as it is important not to be judgmental at this stage; members of staff listen carefully to all accounts, being non-confrontational and not attaching blame until the investigation is complete

All concerned Children are informed that they must not discuss the interview with other Children.

Support will be offered to both the alleged victim and the alleged perpetrator and consequences will be considered where appropriate in line with our behaviour policy.

Where appropriate we will seek to support the Children in understanding each other's point of view and offer additional sessions (face to face or remotely as required) to help them to overcome their situation.

Where pupil/Children are at risk of harm as a result of this incident, we will make appropriate external referrals to seek support for those involved.

Some Children may experience poor mental health or feel anxious after experiencing bullying and the School will seek to support and address this by working closely with the pupil, family, and relevant external agencies.

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Where the impact of bullying has a significant impact on the relative academic achievements of the pupil involved the School will seek to address these through targeted interventions, supportive strategies and eventually, if required a SEND assessment in line with the DfE guidance referred to at the top of this appendix.

The process and outcomes will be recorded on CPOMs and appropriate timely referrals made as the need arises during the process. The process will be overseen by the DSL, though other colleagues will likely support the process. The incident will not be closed until both Children agree that they are happy with the outcome. Until then, the School will continue to address the pupil's concerns as far as possible and work towards a resolution to address their concerns. The School will agree with the Children how often they feel able to review the situation but ideally:

A member of the safeguarding and care team will conduct checks to assess whether the bullying has stopped. This will be a weekly check in process and continue for a six week period after the initial complaint of bullying. At the six week point, the DSL/DDSL will meet the victim to ensure all issues have been resolved. Parents will also be contacted to check a positive resolution has been achieved prior to case closure. Only then will case be closed and victims will be signposted in the event of further bullying issues.

Concerns, disclosures, referrals and actions will be recorded and appropriate further referrals made if necessary. Student voice will be recorded when the incidents are followed up after the initial support and interventions have been implemented in line with the above procedure.

Follow up actions or support may include but are not limited to:

If necessary, group dynamics are broken up by members of staff by assigning places in classes.

- The victim is encouraged to tell a trusted adult in school if bullying is repeated.
- The victim is encouraged to broaden their friendship groups by joining lunchtime or after-school club or activity.
- If appropriate, follow-up correspondence is arranged with parents/carers

Children who have been bullied are supported in the following ways:

- Being listened to, believed, and reassured
- Having an immediate opportunity to meet with a pastoral member of the team or a staff member of their choice
- Being offered continued support
- Being offered counselling, where appropriate
- Students who have bullied others are supported in the following ways:
 - Receiving a consequence for their actions
 - Being able to discuss what happened
 - Reflecting on why they became involved
 - Understanding what they did wrong and why they need to change their behaviour
 - Appropriate assistance from parents/carers
 - External referrals for support if required

Bullying outside of the School:

Teachers have the power to discipline students for misbehaving outside of the school premises. This can relate to any bullying, or child-on-child abuse incidents occurring anywhere off the school premises, such as on school or public transport, outside the local shops, or in a town or village centre. Please refer to the Positive conduct/Behaviour Policy.

Where bullying outside school is reported to school staff, it is investigated and acted on. In all cases of misbehaviour or bullying, the teacher can only discipline the student on school premises, or elsewhere when the pupil is under the lawful control of the member of staff.

The Headteacher has a specific statutory power to discipline Children for poor behaviour outside of the school premises. Section 89(5) of the Education and Inspections Act 2006 gives the Principal the power to regulate Children's conduct when they are not on school premises, and therefore not under the lawful charge of a school staff member.

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The DSL/DDSL is responsible for determining whether it is appropriate to notify the police or the anti-social behaviour coordinator of the action taken against a pupil.

If the misbehaviour could be of a criminal nature, or poses a serious threat to a member of the public, the police are always informed.

Roles and responsibilities related to bullying specifically:

It is the responsibility of all stakeholders to be alert to possible bullying of Children and to deal with incidents as the highest priority.

The DSL keeps a Bullying Record of all reported incidents including which type of bullying has occurred to allow for thorough and regular (termly) analyses of the data collected which will be reported to the Headteacher and governing body.

The DSL analyses the data in the Bullying Record at termly intervals in order to identify any trends in the types of bullying occurring and implement the appropriate measures to tackle it.

The DSL arranges appropriate training for staff members.

Members of the pastoral and care team, engage, correspond and meets with parents/carers where necessary. They also provide a point of contact when more serious bullying incidents occur.

Tutors are alert to social dynamics in their class and are available for students who wish to report bullying. They also provide follow-up support after bullying incidents.

Tutors ensure that they are alert to possible bullying situations, particularly exclusion from friendship groups, and that they inform the Engagement and Pastoral Officer of such observations.

All colleagues will avoid gender stereotyping when dealing with bullying.

Throughout the year, the composition of pupil groups shows sensitivity to those who have been the victims of bullying. The pastoral team are often the first people to receive reports of bullying, offer emotional support to victims, and alert the relevant staff members.

Parents/carers are advised to inform their child's Tutor or a member of the pastoral and care team if they are concerned that their child may be bullied or be involved in bullying.

Students are advised to inform a member of staff if they witness bullying, or are a victim of bullying. Students are taught not to make counter-threats if they are victims of bullying.

Students are taught to walk away from any dangerous situations and avoid involving other Children in incidents.

Students are advised to retain and disclose all evidence of cyber bullying as well as offered additional signposts for support outside school hours.

Appendix 3- Harmful or Problematic Sexual Behaviour

Sexual Harassment:

- Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline.
- Sexual harassment violates a student's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.
- If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment includes: (Physical, Verbal and Online Conduct)

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- Sexual comments such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual “jokes” and taunting.
- Physical behaviour, such as deliberately brushing against someone else.
- Sexual threats or pushing someone to do something sexually that they don’t want to or aren’t ready for.

Online sexual harassment includes:

- Non-consensual sharing of images and videos, displaying pictures, photos or drawings of a sexual nature.
- Sharing of sexual images and videos (often known as sexting, nudes or pics)
- Inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.
- Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence refers to the three following offences:

Rape: A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with a 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.

Harmful Sexual Behaviours (HSB):

The term “harmful sexual behaviour” is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. All behaviours receive a proportionate response and even low level HSB is treated as an opportunity to reflect and learn to how to make positive healthy choices and be mindful of risks or harm.

Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits relating to sexual or body-focused behaviours.
- Sexual behaviour affecting progress and achievement.
- Sexual behaviour can also be harmful if one of the individuals is much older (especially where there is two or more years difference, or where one individual is prepubescent and the other is not) and where the child may have SEND.

Identifying Harmful, Problematic or Inappropriate Sexual Behaviour:

All colleagues are aware that Children of any age and gender identification are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.

All colleagues are aware that child-on-child abuse can be manifested in many different ways, including sexting, nudes or pics, gender based abuse, being sexually touched or assaulted, and Children being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.

All colleagues are aware of the heightened vulnerability of Children with SEND. Adults will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore potential indicators further as report them.

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The school's response to harmful sexual behaviour (HSB) involving Children of the same gender will be equally as robust as it is for incidents between Children of the opposite gender or gender identification.

Children will be made aware and actively encouraged to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. We recognise the numerous additional barriers that young people face in disclosing harmful sexual behaviour to adults and will never rely on disclosures alone; colleagues are trained to be vigilant to the signs and indicators of abuse and act on them appropriately and in line with the guidance.

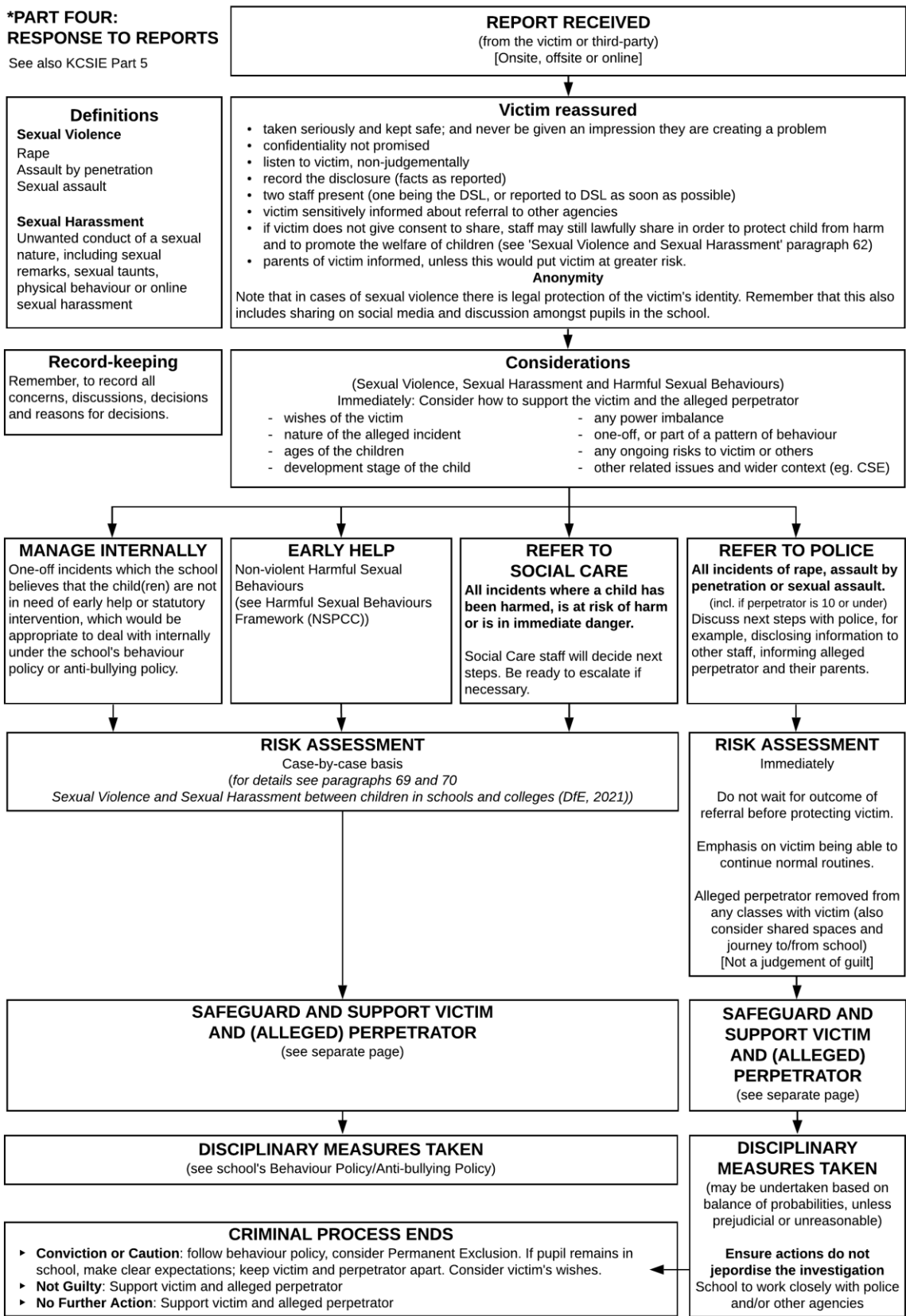
Recognising one or more of the following signs in a pupil may mean they are a victim of harmful sexual behaviour:

- Missing school completely or showing an unwillingness to attend certain lessons
- Injuries such as bruises – either being sustained at school or the pupil may come to school with injuries
- Showing signs of anxiety or depression, or feeling panicked
- Being withdrawn, shy or feeling nervous
- Looking disheveled due to a lack of sleep
- Being abusive to other Children or staff members

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Managing harmful sexual behaviour:

***PART FOUR:
 RESPONSE TO REPORTS**

See also KCSIE Part 5



Source:

*Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2021)

SVSH Flow Chart for Schools 2021 v.1.0

Support available if reports include online behaviour

- The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.
- If the incident involves sexual images or videos held online the Internet Watch Foundation or childline will be consulted to have the material removed: [Report Remove Tool](#)

Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Managing disclosures

We will refer to the statutory guidance in Part 5 of Keeping Children Safe in Education.

Alleged victims will always be taken seriously, reassured, supported and kept safe. Alleged victims will never be made to feel like they are causing a problem or made to feel ashamed.

- If a friend of an alleged victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will *consider why* the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of the DSL.
- Where an alleged incident took place away from the school or online but involved students from the school, the school's duty to safeguard children remains the same.
- All staff will be trained to handle disclosures.
- All staff will ensure that they use the formal reporting system to record and share with the DSL any information or concerns that they have about the safety or wellbeing of a pupil.
- Where online sexual harassment has taken place or images are involved staff will not view or forward any illegal images of a child but will instead consult the guidance from [UKCCIS: Sharing Nudes and Semi-Nudes](#).
- In some cases, it may be more appropriate to confiscate the devices to preserve evidence and hand them to the police of inspection

Effective safeguarding practice includes:

- Offering reassurance and safety and never blame the victim.
- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the child chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the child with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted.
- Only recording the facts as the child presents them – not the opinions of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice.
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy as one of the staff members).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.
- If the allegations of harmful sexual behaviour is against a pupil with SEND, they will record the incident in writing and, working with the SENCO and the DSL, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

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

- The victim's wishes.
- The nature of the incident.
- The ages and developmental stages of the children involved.

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

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

For reports of sexual violence whilst the school establishes the facts, the alleged perpetrator should be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises, and on transport where applicable. These actions should not be seen as a judgement of guilt on the alleged perpetrator, the actions are to protect all Children involved.

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport should be considered immediately.

In all cases, the initial report should be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children should be taken into consideration.

Anonymity

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of students involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the students involved.

Risk Assessment

The DSL or a deputy will make an immediate risk and needs assessment (Incident response risk assessment) any time there is a report of sexual violence.

For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts, and for incidents of sexual violence, it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.

Risk assessments will consider:

- The context of the incident.
- The student or students that have been harmed
- The student or students that have caused harm.
- The time and location of the event
- Other students at the school, especially any actions that are appropriate to protect them.
- Risk assessments will be recorded on CPOMS and kept under review in accordance with the School's Data Protection Policy.

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

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

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport should be considered immediately.

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In all cases, the initial report should be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all ren should be taken into consideration

Schools are required by law to:

- Safeguard and promote the welfare of their Children.
- Have a behaviour policy and other measures in place to prevent bullying.
- In maintained secondary schools, teach RSE, following the statutory guidance.
- Comply with the Human Rights Act 1998 – if a pupil is subjected to sexual violence or sexual harassment, it may breach their rights under the Act.
- Not unlawfully discriminate against Children because of their protected characteristics.
- Support Children regarding their sex, sexuality and, if appropriate, gender reassignment.
- Take positive action, where demonstrably proportionate, to deal with disadvantages affecting a group, e.g., taking action to support girls if there is evidence that they are being disproportionately subjected to sexual violence or harassment.
- Eliminate unlawful discrimination, harassment, and victimisation.
- Advance equality of opportunity between different groups and foster good relations between different groups – meaning that schools must consider equality implications whenever policy decisions are made.
- Keeping records of sexual violence and sexual harassment reports is essential, as this information should be considered whenever schools make equality decisions.

Child that was harmed (victim)

Alleged Victim: Any decisions regarding safeguarding and supporting the alleged victim should be made with the following considerations in mind:

- The age and developmental stage of the victim
- The terminology the school uses to describe the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim should not be made to feel ashamed about making a report
- Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, it is essential that a dialogue is kept open and the victim can choose to appoint a designated trusted adult.
- Victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. This should only happen when the victim wants it to, *not because it makes it easier to manage the situation*.
- Victims may require support for a long period of time and schools should be prepared to offer long-term support in liaison with relevant agencies.
- Everything possible should be done to prevent the victim from bullying and harassment as a result of any report they have made.
- If the victim is unable to remain in the school, alternative provision or a move to another school should be considered – this should only be considered at the request of the victim and following discussion with their parents.
- If the victim does move to another school, the DSL should inform the school of any ongoing support needs and transfer the protection file.
- It is important to remember that the level of support required for a one-off incident of sexualised name calling is likely to be entirely different to the level required following a report of rape.
- What a proportionate response looks like
- A case study example can be found on page 35 of the DfE guidance.

Child that has harmed - Alleged Perpetrator

Alleged Perpetrator- When considering support for the alleged perpetrator academics should consider:

- The terminology they use to describe the alleged perpetrator or perpetrator.

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- The balance of safeguarding the victim and providing the alleged perpetrator with education and support.
- The reasons why the alleged perpetrator may have abused the victim – and the support necessary.
- Their age and developmental stage.
- What a proportionate response looks like.
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.
- When making a decision, advice should be taken from ren's social care, specialist sexual violence services and the police as appropriate.
- If the alleged perpetrator moves to another school (for any reason), the DSL should inform the destination school of any ongoing support needs and transfer the protection file.

Disciplining the alleged perpetrator

- Teachers can discipline children whose conduct does not meet the standards reasonably expected of them. Disciplinary action can be taken whilst investigations are ongoing, and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty.
- Schools should make such decisions on a case-by-case basis, with the DSL taking a leading role. The school should take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and children's social care can help schools make such decisions.
- Schools should also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts.

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

Please see overleaf for Risk Assessment template

Risk assessment

AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES	ACTIONS
<p>Details of the incident</p> <p>Record details of the incident from the point of view of both children</p>	<ul style="list-style-type: none"> • How serious is the incident? Was it a crime? • Were there any other victims? [If yes, add extra columns for each other child] • Do we need to make arrangements to limit contact between the children involved, other than keeping them a reasonable distance apart on school premises including at before and after-school activities? (If the allegation relates to rape, assault by penetration, or sexual assault, the answer is automatically yes) • How did the school find out about it? Was it reported directly or by someone else with knowledge of the incident? • Did the incident take place within an intimate relationship between the children? • Are there any related issues, including links to child sexual exploitation and child criminal exploitation? 			<p>Use this column to record additional information that may be relevant</p> <p>For example, previous, unrelated behaviour incidents</p>	
<p>Social risks</p>	<ul style="list-style-type: none"> • Do the children share a peer group? Are people in their friend group likely to take sides? • Do they both attend your school? • Do other people know about the incident? Do those people understand: <ul style="list-style-type: none"> ○ Who they can talk to if they have concerns about the people involved, or about their own safety and wellbeing ○ The importance of confidentiality ○ If, and how, they may need to be involved in any further investigations • Are they likely to be the subject of gossip, bullying or further harassment? • Have there been previous incidents of sexually inappropriate behaviour within their peer group(s)? • Do they risk being alienated from their friend group(s) as a result of this incident? 				

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AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES	ACTIONS
Physical risks	<ul style="list-style-type: none"> • Do they feel, or continue to feel, physically threatened by the other child? • Do you have reason to believe there is a continued risk to the safety and wellbeing of the children involved, or other Children and staff? • Is either party at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers) • Do they share classes/break times/etc.? • 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? • Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) on school transport? How can we provide support here? 				
Environmental risks	<ul style="list-style-type: none"> • Do they live in a home where violence or abuse has occurred? • Do they live in or near an area or location known to police to be high risk for sexual harassment or assault? • Are they active on social media? If so, how? Do they know how to protect themselves from online grooming? • What activities do they take part in outside of school? • Are parents clear about: <ul style="list-style-type: none"> ○ How the school (and partner agencies) are handling the incident? ○ Confidentiality? ○ The conduct expected of them while an investigation is ongoing? 				

DATE/REVIEWS	UPDATES MADE	REASONS FOR UPDATES	UPDATES MADE BY
	E.g. "Updated lunchtime arrangements"	E.g. "Feedback from Child A"	

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DATE/REVIEWS	UPDATES MADE	REASONS FOR UPDATES	UPDATES MADE BY

DSL/DDSL	Name	Signature
Parent/Carer	Name	Signature
Student	Name	Signature

Appendix 4 - Weapons Responding to Weapons in School

If a student is discovered to have brought a weapon onto school premises, the following actions will be taken in line with statutory guidance and safeguarding best practice:

1. Immediate Safety:

The safety of all students and staff is the first priority. The situation will be managed to ensure there is no immediate risk of harm.

2. Notification:

- **Parents/carers** and the **police** will be informed as soon as it is safe to do so, in accordance with statutory requirements and local safeguarding partnership procedures.
- The **Designated Safeguarding Lead (DSL)** and **Headteacher** will be informed immediately.

3. Safeguarding and Contextual Assessment:

- The DSL and Headteacher will consider **contextual safeguarding** risks, including extra-familial and familial harm, both to the pupil who brought the weapon and to any potential victims or the wider school community.
- Where there is a concern for the welfare of any person, a referral to **children's social care** will be made as soon as it is safe to do so, in line with *Keeping Children Safe in Education* and *Working Together to Safeguard Children*.

4. Investigation and Sanctions:

- An investigation will be carried out in accordance with the school's behaviour and safeguarding policies.
- The pupil will likely be placed on a **fixed-term exclusion** while the investigation is ongoing.
- The incident will be reported to the **local governing body** and recorded in line with statutory requirements.

5. Definition of Weapons:

Weapons include, but are not limited to:

- Firearms (including guns, pellet guns, BB guns, air guns, replica guns)
- Knives and bladed articles
- Martial arts objects (e.g., nunchucks, death stars)
- Tools used or threatened to be used offensively (e.g., screwdrivers, hammers, chisels, bradles)
- Razors, razor blades, aerosols, chains, scissors, and similar items
- **Homemade implements** intended to injure, threaten, or intimidate

Note: If any item (e.g., scissors) is used or threatened to be used as a weapon, it will be treated as such and sanctions will be applied in accordance with the school's behaviour management policy.

6. Disciplinary Hearing:

At the disciplinary hearing, the following issues will be considered:

- How the weapon was found, discovered, or reported
- The nature and type of weapon
- The location and storage of the weapon on school premises
- Knowledge of third parties regarding the weapon's presence
- The perceived purpose for bringing the weapon into school
- The pupil's preceding behaviour and attitude
- Any contextual safeguarding risks relating to the pupil or the incident
- Safeguarding implications for all Children, including the impact of any exclusion

7. Compliance:

This procedure is in accordance with:

- *Keeping Children Safe in Education*
- *Working Together to Safeguard Children*
- The Education Act (2002)
- Local safeguarding partnership procedures