



ROOTS 4 LEARNING CIC

Child-on-child Abuse Policy

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Signed by			
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Statement of intent

Roots is committed to safeguarding and promoting the welfare of every pupil, both inside and outside of the centre premises, and is aware that abuse against children can be inflicted by other children. We implement a whole-centre preventative approach to managing child-on-child abuse, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of mutual respect amongst all pupils.
- Teaching pupils about behaviour that is acceptable and unacceptable.
- Identifying and making provision for any pupil that has been subject to abuse.
- Ensuring that members of the Trust Board, the Co-Headteacher and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child-on-child abuse, and know to refer concerns to the DSL.
- Ensuring that safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils and parents.
- Creating a culture where all concerns are taken seriously, never dismissed as 'banter', 'part of growing up' or 'just having a laugh', and are responded to promptly and appropriately.

The DSL is **Emma Foientte**. In the absence of the DSL, child protection matters will be dealt with by **Liz Key**.

Legal framework

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

- Equality Act 2010
- Human Rights Act 1998
- Sexual Offences Act 2003
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Children's Wellbeing and Schools Act 2026
- DfE (2026) 'Working together to safeguard children'
- DfE (2026) 'Keeping children safe in education 2026'

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

- DfE (2015) 'What to do if you're worried a child is being abused'

- DfE (2018) 'Information sharing'
- DfE (2021) 'Sexual violence and sexual harassment between children in schools and colleges'
- Department for Science, Innovation and Technology, and UK Council for Internet Safety 'Sharing nudes and semi-nudes: how to respond to an incident (overview)'
- Department for Science, Innovation and Technology, and UK Council for Internet Safety 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- National Police Chief's Council (2020) 'When to call the police: guidance for schools and colleges'

This policy operates in conjunction with the following centre policies:

- Child Protection and Safeguarding Policy
- Relational Behaviour Policy
- Data Protection Policy
- Anti-bullying Policy
- Suspension and Exclusion Policy
- Online Safety Policy
- Staff Code of Conduct
- Personal Electronic Devices Policy
- Data and Cyber-security Breach Prevention and Management Plan
- Children Missing Education Policy
- Low-level Safeguarding Concerns Policy
- Youth Product Sexual Imagery Policy

Definitions

"Child-on-child abuse" is defined, for the purposes of this policy, as any form of abuse inflicted by one child or a group of children, i.e. individuals under the age of 18, against another child or group of children. This policy covers child-on-child abuse both inside and outside of centre, online or offline, and may involve a single child or a group of children abusing another child or group of children.

"Harmful sexual behaviour" is defined as any sexual behaviour which:

- Does not observe and respect any individuals on the receiving end of the behaviour, e.g. touching someone without their consent.
- Is inappropriate for the age or stage of development of the pupil.
- Is problematic, abusive or violent.
- May cause developmental damage.

Harmful sexual behaviour may be harmful to the child displaying the behaviour as well as those affected by it.

Please note: Harmful sexual behaviour can occur online and/or face-to-face, and can also occur simultaneously between the two.

This policy will use the following terms to describe pupils involved in child-on-child abuse:

- **Victim(s)** -- the individual(s) against whom the abuse has, or has allegedly, been inflicted.
- **Perpetrator(s)** -- the individual(s) exhibiting abusive behaviour against their peers.
- **Alleged perpetrator(s)** -- individual(s) against whom a report of abusive behaviour has been made, where guilt has not yet been ascertained.

Please note: The use of the word 'alleged' does not mean that the pupil in question is not guilty of child-on-child abuse, that the centre does not believe the allegation, or that the allegation will not be taken seriously. Staff will remember that the centre has a legal duty of care to all perpetrators and alleged perpetrators who are pupils at the centre, including a requirement to ensure they can access their education. Staff will recognise that the centre has safeguarding and educational responsibilities towards all pupils involved, including those alleged to have displayed harmful behaviour. Staff will also keep in mind that, in some cases, the abusive behaviour will have been harmful to the perpetrator as well. Victims will be reassured that use of the term 'alleged perpetrator' is not an attempt to discredit their allegation.

Staff will also be conscious of the fact that not everyone who has been subjected to abuse considers themselves a victim or would want to be described this way. Staff will be prepared to use any term which the individual child is most comfortable. Staff will think very carefully about terminology when speaking in front of pupils, and the use of appropriate terminology will be determined on a case-by-case basis.

Roles and responsibilities

The Trust Board has a duty to:

- Ensure that the centre complies with its duties under the above child protection and safeguarding legislation.
- Hold the centre to account for its obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements, and the arrangements published by the safeguarding partners.
- Guarantee that the policies, procedures and training opportunities in the centre are effective and comply with the law at all times.
- Guarantee that the centre contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the centre's arrangements for handling child-on-child abuse take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.

- Appoint a member of staff to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, ensuring that they are trained to the same standard as the DSL, and that the role is explicit in their job description(s).
- Ensure that the DSL has the appropriate status and authority within the centre to carry out the duties of the post.
- Ensure the DSL is given the additional time, funding, training, resources and support needed to carry out the role effectively.
- Make sure that pupils are taught about child-on-child abuse, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Ensure that staff members receive appropriate training to support all pupils, including those who may be more vulnerable to bullying, discrimination or abuse, e.g. pupils who are LGBTQ+.
- Ensure the centre has clear systems and processes in place for identifying possible risk of harm in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation in relation to child-on-child abuse.
- Make sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Ensure that all Trust Board members receive appropriate safeguarding and child protection (including online) training at induction that is regularly updated, in order to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust, whole-centre approach to safeguarding, this training should include, amongst other things, the expectations and responsibilities on staff in relation to filtering and monitoring.

The Co-Headteacher has a duty to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Ensure that the policies and procedures adopted by the Trust Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.

- Provide staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Code of Conduct, part one and, where appropriate, Annex A of the 'Keeping children safe in education' (KCSIE) guidance, the Behaviour Policy, the Children Missing Education Policy, online safety training, and the identity of the DSL and any deputies.
- Ensure staff receive training on recognising indicators of abuse and handling disclosures or concerns about a pupil.

The DSL has a duty to:

- Understand and keep up-to-date with local safeguarding arrangements.
- Act as the main point of contact with the three safeguarding partners and the child death review partner.
- Make the necessary child protection referrals to appropriate agencies.
- Understand when they should consider calling the police, in line with the National Police Chiefs' Council (NPCC) [guidance](<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>).
- Liaise with the Co-Headteacher to inform them of safeguarding issues and ongoing enquiries.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Act as a source of support for pupils who have been abused by, or who have abused, other pupils.
- Lead the centre in taking a preventative approach to child-on-child abuse.

Other staff members have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession.
- Provide a safe environment in which pupils can learn.
- Act in accordance with centre procedures with the aim of eliminating unlawful discrimination, harassment and victimisation in relation to child-on-child abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and understand that children can be at risk of harm inside and outside of the centre, inside and outside the home, and online.
- Adhere to the early help process and understand their role in it.
- Understand and adhere to the procedure to follow in the event that a child confides they are being abused by a peer.
- Understand that children may not feel ready or know how to tell someone that they are being abused, and/or they may not recognise their experiences as harmful.

- Understand that technology is a significant component in many safeguarding issues.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Understand the importance of challenging inappropriate behaviours between children that are abusive in nature, and not dismissing abusive behaviour as 'banter', 'part of growing up' or 'just having a laugh'.
- Build trusted relationships with children and young people which facilitate communication.
- Keep detailed, accurate, secure written records of safeguarding concerns, decisions made, and whether or not referrals have been made, and understand the purpose of this record-keeping.
- Report all concerns relating to child-on-child abuse to the DSL (or deputy DSL) without delay and never assume that somebody else has already acted.

Types of child-on-child abuse

Staff will familiarise themselves with the forms that child-on-child abuse can take, including but not limited to:

Physical abuse

A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to another child.

Sexual abuse

A form of abuse involving sexual activity between children -- sexual abuse, for the purposes of this policy, is divided into two categories: sexual violence and sexual harassment.

"Sexual violence" encompasses the definitions provided in the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, i.e. non-consensual sexual touching, and causing another child to engage in sexual activity without consent, e.g. forcing someone to touch themselves sexually.

"Sexual harassment" refers to any sexual behaviour that could violate another child's dignity, make them feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment, including:

- Sexualised jokes, taunting or comments.
- Physical behaviour, e.g. deliberately brushing against someone.
- Online sexual harassment, including:
- Upskirting.
- Sexualised online bullying.
- Unwanted sexual comments and messages, including on social media.

- Sexual threats or coercion.
- The creation or sharing of AI-generated or AI-altered nudes and semi-nudes.

The **"sharing of sexualised imagery"** can also constitute sexual harassment -- this refers to the consensual and non-consensual sharing between pupils of sexually explicit content, including images and videos that have been generated or altered using AI, including that which depicts:

- Another child posing nude or semi-nude.
- Another child touching themselves in a sexual way.
- Any sexual activity involving another child.
- Someone hurting another child sexually.

Staff will be aware that children creating, possessing, and distributing indecent imagery of other children is a criminal offence, even where the imagery is created, possessed, and distributed with the permission of the child depicted, or by the child themselves. Incidents of sharing sexualised imagery will be handled in line with the Youth Product Sexual Imagery Policy and the Child Protection and Safeguarding Policy.

Bullying

Many kinds of behaviour can be considered bullying, and bullying can be related to almost anything. Bullying may constitute child-on-child abuse where it is abusive, persistent or causes significant harm to the victim.

Bullying is acted out through the following mediums:

- Verbally
- Physically
- Emotionally
- Online (cyberbullying)

Bullying will generally be handled in line with the Anti-bullying Policy; however, particularly severe instances will be handled in line with this policy and the Child Protection and Safeguarding Policy.

Online abuse

This involves the use of technology and the internet, including social media, online gaming platforms, messaging services and AI-enabled technologies, in order to harass, threaten, intimidate, exploit or abuse another child. Instances of online abuse will be managed in line with this policy, the Online Safety Policy and the Anti-bullying Policy.

Discriminatory behaviour

Discriminatory behaviour encompasses abuse inflicted on a pupil because of their protected characteristics, e.g. religion, ethnicity, gender, sexual orientation, culture, or any SEND. Discriminatory behaviour is never acceptable, and all cases will be handled in line with this policy and the Child Protection and Safeguarding Policy. The centre also recognises that some pupils, including those with SEND, may be at increased risk of abuse or discrimination.

In accordance with the Equality Act 2010, centres will not tolerate unlawful discrimination against pupils because of any protected characteristics they may have.

Intimate partner abuse

This involves a romantic partnership between children in which one or both partners are emotionally, physically or sexually abusive to the other (sometimes known as 'teenage relationship abuse'). This could include:

- Repetitive insults.
- Controlling behaviour, e.g. preventing a child from socialising with others or deliberately isolating them from sources of support.
- Sexual harassment.
- Threats of physical or sexual abuse.

The centre will manage intimate partner abuse in the same way as a case of abuse between any other children, i.e. via the processes outlined in the 'Handling reports of sexual violence and harassment' section of this policy, and in line with the Child Protection and Safeguarding Policy.

A whole-centre approach to child-on-child abuse

The centre will continue to involve all members of the centre community, including the Trust Board, staff, pupils, parents and other stakeholders, in creating a whole-centre approach to child-on-child abuse.

The Trust Board will ensure that keeping children safe and protected from harm, including child-on-child abuse, is central to all policies and procedures implemented across the centre. The centre will ensure that procedures for handling child-on-child abuse are transparent, clear and understandable, and are readily accessible to any member of the centre community who wishes to access them.

The centre will implement a contextual approach to safeguarding pupils against child-on-child abuse, and will ensure that all procedures take into account incidents of child-on-child abuse that occur outside of centre or online, including where it occurs concurrently. Wider environmental factors that may be present in a pupil's life will also be considered.

The Co-Headteacher will ensure that all staff receive adequate training on handling child-on-child abuse.

Centre culture

The centre will prioritise cultivating a safe and respectful environment amongst pupils, and ensure that all pupils are aware that the centre will not tolerate child-on-child abuse of any kind and will respond promptly, proportionately and appropriately to all concerns.

The centre will promote respectful interactions amongst pupils, and all staff will model appropriate and respectful behaviour. Staff will take care to avoid normalising harmful behaviour, particularly harmful sexual behaviour, e.g. by refraining from the use of phrases such as 'boys will be boys' or describing such behaviour as 'just

having a laugh' or 'part of growing up', as these phrases can lead to a culture of unacceptable behaviours and normalised abuse.

The centre will ensure that wider societal factors that exacerbate the problem of child-on-child abuse are reflected in its approach to creating a preventative culture. This means that individuals who are more likely to be abused, e.g. girls, LGBTQ+ pupils, pupils with SEND, pupils who are LAC and PLAC, and pupils with social workers, or who are at increased risk of acting as a perpetrator in abusive situations, e.g. due to abusive home situations or difficulties managing their emotions, are given additional support from an early stage. The centre will have a clear set of values and standards that will be upheld and demonstrated throughout all aspects of centre life and will be underpinned by the centre's policies, procedures and curriculum.

The centre will manage all early help and intervention for pupils that show early signs of harmful behaviour, or early signs of being the victim of harmful behaviour, in line with the Child Protection and Safeguarding Policy.

Support before statutory intervention

Upon receiving notice of a concern or incident, the DSL or deputy DSL will advise whether the children involved in a child-on-child abuse incident require referral to children's social care or would benefit from support before statutory intervention, including universal services, community-based early help, or the targeted early help level of Family Help. This will be decided on a case-by-case basis following consideration of all available information, with the aim of preventing concerns from escalating and improving outcomes for the children involved.

The rationale for the decision to provide support before statutory intervention as opposed to a referral to children's social care will be recorded on the Safeguarding Concern Report Form.

The centre will ensure that the DSL and deputy DSL are suitably trained in local arrangements for support before statutory intervention, including community-based early help and the targeted early help level of Family Help, and are able to access further advice and support where required.

The centre will ensure that pupils who show early signs of harmful behaviour, or who may be at risk of experiencing child-on-child abuse, are considered for support before statutory intervention, including universal services, community-based early help, or the targeted early help level of Family Help, where appropriate, in line with the Child Protection and Safeguarding Policy and local safeguarding arrangements.

Curriculum

The centre maintains the position that education surrounding respectful and healthy attitudes and behaviour towards others is the best way to combat child-on-child abuse in the centre. All staff, not just teaching staff, will be responsible for passing this knowledge on to pupils.

In order to prevent child-on-child abuse and address the wider societal factors that can influence behaviour, the centre will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum and extra-curricular activities.

The centre will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. The centre will also teach a planned programme of evidence-based RSHE, delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Such content will be fully inclusive, age and stage of development appropriate (especially when considering the needs of pupils with SEND), and tackle issues such as the following:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- How to recognise an abusive relationship, including coercive and controlling behaviour
- LGBTQ+ identities and relationships
- Body confidence and self-esteem
- The risks associated with online abuse, including the making or sharing of nudes and semi-nudes, AI-generated or AI-altered intimate images, and harmful online content
- The concepts of, the laws relating to, and how to access support for the following:
 - Sexual consent
 - Sexual exploitation
 - Abuse
 - Grooming
 - Coercion
 - Harassment
 - Rape
 - Domestic abuse
 - So called honour-based violence, e.g. forced marriage or FGM
 - What constitutes as sexual violence and sexual harassment and why these are always unacceptable

Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They will be taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.

The curriculum will ensure that pupils of all ages are taught about and understand the concept of consent and its importance in an age-appropriate way.

Protecting pupils with increased vulnerability

The centre is aware that, while child-on-child abuse can be perpetrated by, and against, anyone, there are certain groups of pupils who are at an increased risk of being on the receiving end of child-on-child abuse.

Staff will be careful to acknowledge the increased risk certain pupils face while refraining from making assumptions about the nature of any reported, witnessed or suspected abuse. Staff will be aware that pupils who are generally at increased risk of abuse can also be perpetrators of abuse.

The centre will ensure that action is taken, where possible, before major concerns arise; therefore, incidents of low-level abuse related to the characteristics of the below groups will be handled in line with early help procedures and the centre's arrangements for support before statutory intervention, which are laid out within the Child Protection and Safeguarding Policy and the Low-level Safeguarding Concerns Policy.

Girls

Staff will be aware that girls are more likely to be on the receiving end of child-on-child sexual abuse than their male counterparts, and that sexual violence and harassment against girls is very common and accounts for the majority of cases.

Taking into account that sexual harassment against girls is widespread in society, and largely based in gender inequality, the centre will aim to encourage gender equality in all aspects of its operations. The centre will aim to promote and nurture healthy attitudes and relationships amongst pupils of all genders, e.g. by challenging and working to deconstruct gender stereotypes in centre.

Staff will challenge any incidents of misogynistic language or gender-based abuse, whether of a sexualised nature or not, as holding misogynistic viewpoints can make a pupil more likely to commit sexualised violence in the future.

LGBTQ+ pupils

Staff will be aware that pupils who are LGBTQ+, or are perceived to be LGBTQ+ whether they are or not, are more likely to be targeted by their peers, e.g. for discriminatory bullying.

The centre will hold a strict policy towards pupils using homophobic, biphobic or transphobic language, regardless of whether or not the language is being directed at another individual. Every staff member will be individually responsible for challenging such behaviour and making clear to all pupils that any abuse towards pupils who are LGBTQ+, or who are perceived to be, is unacceptable.

The centre will ensure that it is able to provide a safe space for LGBTQ+ pupils to speak out and/or share their concerns with members of staff.

Lesbian, gay and bisexual pupils

Staff will be aware that pupils who are lesbian, gay or bisexual, or who are perceived to be, may be more likely to experience discriminatory bullying, harassment or abuse from their peers.

The centre will not tolerate homophobic or biphobic language or behaviour, regardless of whether or not it is directed at a particular individual. All staff will challenge such behaviour and make clear that discrimination, harassment and abuse are unacceptable.

The centre will ensure that pupils who are lesbian, gay or bisexual, or who are perceived to be, can access appropriate support and are able to raise concerns with trusted members of staff.

Pupils who are questioning their gender

Staff will recognise that pupils who are questioning their gender may also be vulnerable to bullying, harassment or abuse from their peers. Concerns affecting these pupils will be managed on an individual basis, taking account of the pupil's needs, wishes, wellbeing and safety.

The centre will not tolerate transphobic language or behaviour and will challenge any incidents promptly and appropriately. Staff will ensure that pupils who are questioning their gender are able to raise concerns with trusted members of staff and access appropriate support in line with the Child Protection and Safeguarding Policy.

Pupils with SEND

Staff will be aware that pupils with SEND are at increased risk of child-on-child abuse, as they are three times more likely to be abused than their peers, particularly in the context of harmful sexual behaviour, sexual harassment and sexual violence. The centre will ensure that there are mechanisms in place to support pupils with SEND in reporting abuse, with due regard that these pupils may face additional barriers to reporting abuse and that spotting signs of abuse in these pupils may be harder.

Staff will avoid assuming that changes in the behaviour of pupils with SEND are as a result of their needs or disability, and will report any concerns to the DSL. The DSL and the SENCO will collaborate in the handling of instances of abuse towards pupils with SEND to ensure that barriers to communication can be effectively managed.

Pupils from ethnic minority backgrounds

Staff will be aware that minority ethnic pupils, particularly black pupils, may be less likely to report abuse committed against them, and may be more likely to be misidentified as perpetrators of abuse.

The centre will hold a zero-tolerance stance towards pupils using racist language, regardless of whether the language is being directed at another individual. Every staff member will be individually responsible for challenging such behaviour and making clear to all pupils that any abuse towards pupils from ethnic minority backgrounds is unacceptable.

Staff will also be aware that girls, pupils with SEND, or LGBTQ+, or perceived LGBTQ+ pupils, who are from ethnic minority backgrounds are likely to face increased abuse due to the intersection of these identities. Staff will be vigilant with regard to these pupils and the ways in which other pupils behave towards them, in order to ensure any incidents or potential incidents can be handled as soon as they occur.

LAC, PLAC, and pupils with social workers

Staff will recognise that LAC, PLAC, and pupils with social workers may be more vulnerable to abuse because of the experiences of adversity and trauma they have

faced. The centre will ensure that these pupils receive appropriate support and that safeguarding concerns are identified and acted upon promptly.

Channels for pupils to report abuse

Pupils will be able to report incidents of child-on-child abuse or concerns about the behaviour of their peers through the following channels:

- Sending a message to the confidential email address monitored by the DSL and their deputies.
- Speaking with key adults within the centre
- During check-ins with key adults
- Disclosing to the DSL in person during set walk-in hours.

All channels for reporting abuse will be promoted and publicised throughout the centre, and all pupils will be made aware of how, and to whom, to report incidents of abuse. The centre will also ensure pupils are aware of the type of behaviour that should be reported, ranging from criminal behaviour, e.g. rape or sexual assault, to everyday harassment, e.g. sexualised jokes or inappropriate comments, to ensure that victims do not view their experience as 'not serious enough' to report, while making it clear that they should report any behaviour that concerns them, even if they are unsure whether it constitutes abuse.

The centre will maintain a culture that promotes reporting abuse, in which pupils feel safe, listened to and supported, whether the individual reporting is the victim, a bystander, or a friend or relative of the victim. Staff will address any incidents of pupils equating reporting abuse to 'snitching' or being a 'tattle-tale', and will convey to these pupils how important it is to report abuse to help tackle the wider problem of child-on-child abuse in centres, and will reinforce that reporting concerns helps to protect pupils and prevent further harm.

Pupils will be made aware that, while the centre will always take their wishes into account, it cannot promise confidentiality where doing so would place a child at risk of harm.

Staff identifying and reporting concerns

Staff will receive safeguarding training as part of their induction, and will receive regular safeguarding and child protection updates, including **annual** refresher training. This training will include guidance on how to recognise indicators of child-on-child abuse of all kinds, and how to distinguish between behaviour, particularly sexual behaviour, that is developmentally appropriate and that which is harmful.

When identifying pupils at risk of potential harm or who have been harmed by their peers, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn

- Knowledge ahead of their age, e.g. sexual knowledge
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem
- Changes to their social group, e.g. spending time with older pupils, or social isolation
- Alcohol or substance misuse

Where a pupil is displaying signs of being impacted by child-on-child abuse, or perpetrating child-on-child abuse, staff will report this to the DSL or deputy immediately, or as soon as possible after the concern arises.

Staff will challenge all instances of abusive or harmful behaviour displayed by pupils that they witness or are reported to them. Staff will not wait for concerns or situations between pupils to escalate before intervening; minor or singular instances of abusive behaviour will still be brought to the attention of the DSL and the pupil will always be spoken to about their behaviour and disciplined, where appropriate, in line with the Behaviour Policy.

Staff will enforce the centre's policy that no known and substantiated incident of abusive or harmful behaviour between pupils will occur without consequences for the perpetrator(s), although these consequences will be decided on a case-by-case basis and will take into account the views of any victims involved, the context of the behaviour, the needs of all pupils involved, and the severity of the incident.

Staff will be aware that just because a victim of abusive behaviour does not report the behaviour or react to the behaviour negatively, this does not mean that the behaviour is not still harmful; staff will be made aware that some pupils will be uncomfortable challenging their peers on inappropriate behaviour, or may not be aware themselves that the behaviour is abusive. A lack of disclosure or visible distress will not be interpreted as an indication that no harm has occurred.

Staff will ensure that both the perpetrator(s), or alleged perpetrator(s), and the victim(s) understand that such behaviour inflicted by or against them was unacceptable; staff will be made aware that failing to challenge a pupil on unacceptable behaviour can normalise that behaviour not just for the pupil in question, but for all pupils who see the behaviour going unchallenged. Victims will be reassured that the behaviour they experienced was not acceptable and that they will be supported appropriately.

Staff will remain cognisant that downplaying abusive behaviour can lead to a culture of unacceptable behaviour throughout the centre and, as such, will treat all displays or reports of abusive behaviour with the utmost severity and sensitivity, and proportionately, in order to reinforce to all pupils that such behaviour will not be tolerated, and to prevent further instances of this behaviour in the future.

Serious violence

The centre recognises that child-on-child abuse may involve serious violence and that involvement in serious violence, either as a victim or perpetrator, can be an indicator that a child is at risk of significant harm.

Staff will be alert to the signs that a pupil may be at risk from, or involved in, serious violence. Indicators may include, but are not limited to:

- Increased absence from centre.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in educational performance.
- Signs of self-harm, a significant change in wellbeing, or unexplained injuries.
- Unexplained gifts or new possessions, which may indicate criminal exploitation or involvement with criminal networks or gangs.

Staff will understand that certain factors may increase a child's vulnerability to serious violence, including previous experiences of abuse or neglect, suspension or exclusion from education, offending behaviour, substance misuse, or previous involvement in violence.

The centre will also recognise that the risk of serious violence may increase during journeys to and from centre, or in locations outside the centre premises. The centre will seek to understand local risks by listening to pupils, consulting staff and working with safeguarding partners where appropriate. Where concerns are identified, appropriate safeguarding action will be taken in accordance with the Child Protection and Safeguarding Policy.

The DSL will work with the police, children's social care and other relevant agencies, where appropriate, to assess and manage any identified risks. Where necessary, pupils will be referred for support before statutory intervention, Family Help or statutory safeguarding services in line with local safeguarding arrangements.

Handling reports of sexual violence and harassment

Staff will always, when handling an incident of alleged abuse, take the report of the victim seriously, reassure them, support them and work to keep them safe. Victims will never be made to feel like they are causing a problem by reporting **any** form of abuse, be made to feel ashamed, or have their experience minimised by staff at the centre. Staff will be aware of the importance of not downplaying any reports of abuse; however, will ensure that they remain sympathetic, and observant of the duty of care, to both the alleged perpetrator(s) and victim(s).

If a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action -- they will never assume that someone else will deal with it, or wait for a disclosure. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves, and the discussion will be handled sensitively and with the help of children's social care where necessary. If staff are in any doubt, they will speak to the DSL. All staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, and/or they may not recognise their experiences as harmful. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have any concerns.

Where an alleged incident took place away from the centre or online but involved pupils from the centre, the centre's duty to safeguard pupils remains the same and the incident will be treated equally as seriously and investigated in the same way as an incident that took place in centre.

All staff will be trained to handle disclosures. Effective safeguarding practice includes:

- Never promising confidentiality at the initial stage.
- Only sharing the report with those necessary for its progression.
- Explaining to the victim what the next steps will be and who the report will be passed to.
- Recognising that the person the pupil chose to disclose the information to is in a position of trust.
- Being clear about boundaries and how the report will be progressed.
- Not asking leading questions and only prompting the pupil with open questions.
- Waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, staff will ensure they remain engaged and not appear distracted.
- Understanding that victims may not disclose the whole picture immediately and may be more comfortable providing information on a step-by-step basis.
- Ensuring that dialogue is kept open and encouraged.
- Only recording the facts as the pupil presents them -- not the opinions of the note taker.
- Where the report includes an online element, being aware of searching, screening and confiscation advice.
- Wherever possible, managing disclosures with two staff members present (preferably with the DSL or a deputy).
- Informing the DSL or deputy as soon as possible after the disclosure if they could not be involved in the disclosure.

The DSL will be informed of any allegations of abuse against pupils with SEND. They will record the incident in writing and, working with the SENCO, decide what course of action is necessary, with the best interests of the pupil in mind at all times.

Confidentiality

The centre will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the centre not to tell anyone about the disclosure, the centre will not make this promise. The centre will adhere to the principle that, even without the victim's consent, the information may still be lawfully shared if it is in the public interest and protects children from harm. The centre will explain to the victim that information will only be shared on a need-to-know basis and only where necessary to safeguard them or other pupils.

The DSL will consider the following when making confidentiality decisions:

- Parents will be informed unless it will place the victim at greater risk
- If a pupil is at risk of harm, is in immediate danger or has been harmed, a referral will be made to children's social care
- Rape, assault by penetration and sexual assault are crimes -- reports containing any such crimes will be passed to the police

The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

There are legal requirements for anonymity where a case is progressing through the criminal justice system. The centre will do all it can to protect the anonymity of children involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the children involved. When deciding on the steps to take, the centre will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours. The centre will ensure that all staff are aware of their responsibility to maintain the anonymity of the children involved and only share information on a need-to-know basis.

Risk and needs assessments

The DSL or a deputy will make an immediate risk and needs 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 and needs assessments will consider:

- The victim's safety and support needs.
- Whether there may have been other victims.
- The alleged perpetrator.
- Other pupils at the centre, and staff, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
- The time and location of the incident, and any action required to make the location safer.

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

The DSL will engage with children's social care and specialist services as needed.

Taking action following a disclosure

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

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

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

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

For reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately. In all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all children will be taken into consideration.

Where a pupil is found to have been involved in harmful sexual behaviour, e.g. non-consensually sharing indecent imagery of another pupil, the centre will help the pupil to move forward from the incident by supporting them in adopting more positive behaviour patterns and attitudes.

Managing the report

The decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to children's social care or the police, the centre will speak to the relevant agency to discuss informing the alleged perpetrator.

There are four likely outcomes when managing reports of sexual violence or sexual harassment:

- Managing internally
- Providing early help, or support before statutory intervention
- Referring to children's social care
- Reporting to the police

Whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment are never acceptable and will not be tolerated. All

concerns, discussions, decisions and reasons behind decisions will be recorded either on paper or electronically.

The following situations are statutorily clear and do not allow for contrary decisions:

- The age of consent is 16.
- A child under the age of 13 can **never** consent to sexual activity.
- Sexual intercourse without consent is **always** rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 **is illegal** -- including children making and sending images and videos of themselves.

Managing internally

In some cases, e.g. one-off incidents, the centre may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support.

Providing early help

The centre may decide that statutory interventions are not required, but that pupils may benefit from early help -- providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent the escalation of sexual violence.

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

Appropriate intervention

In some cases, the centre may decide that statutory intervention is not required but that the children involved would benefit from support through universal services or community-based early help. The DSL, or a deputy, will work with relevant agencies and parents, where appropriate, to access support and help prevent concerns from escalating.

Where children and families require more targeted support than is available through universal services or community-based early help, the centre may make a referral to Family Help in line with local arrangements. The DSL and deputy DSL will be familiar with the local Family Help process and understand how and where to access support.

Referral to children's social care

If a pupil has been harmed, is at risk of harm or is in immediate danger, the centre will make a referral to children's social care. Parents will be informed unless there is a compelling reason not to do so, e.g. if the referral will place the victim at risk. This decision will be made in consultation with children's social care.

The centre will not wait for the outcome of an investigation before protecting the victim and other children.

The DSL will work closely with children's social care to ensure that the centre's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions. If children's social care decides that a statutory investigation is not appropriate, the centre will consider referring the incident again if they believe

the pupil to be in immediate danger or at risk of harm. If the centre agrees with the decision made by children's social care, they will consider the use of other support mechanisms such as early help, pastoral support and specialist support.

Reporting to the police

Reports of rape, assault by penetration or sexual assault will be passed on to the police -- even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to children's social care. The DSL and deputies will follow the local process for referral.

Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the centre to support the pupil with any decision they take, in unison with children's social care and any appropriate specialist agencies.

The DSL and Trust Board will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity. The DSL will be aware of local arrangements and specialist units that investigate child abuse.

In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the centre will continue to engage with specialist support for the victim as required.

Bail conditions

Pupils against whom further action is taken by the police may be released under bail conditions or 'released under investigation' (RUI) in circumstances that do not warrant the application of bail. Where this occurs and the perpetrator returns to centre, the centre's primary focus will be conducting an assessment of the risk the perpetrator poses to the victim or other pupils and staff at the centre, both physically and in terms of trauma or emotional stress, and implementing any mitigating measures necessary to reduce the harm caused.

The centre will work with children's social care and the police to support the victim, alleged perpetrator and other pupils, especially witnesses, during criminal investigations. The centre will seek advice from the police to ensure they meet their safeguarding responsibilities.

The centre will liaise with police investigators to develop a balanced set of arrangements whereby both the alleged perpetrator and the victim can continue to receive a suitable education without compromising any ongoing investigations or the emotional state of the victim.

Managing delays in the criminal justice system

The centre will not wait for the outcome, or even the start, of criminal proceedings before protecting the victim, alleged perpetrator and other children. The associated risk assessment will be used to inform any decisions made. The DSL will work closely with the police to ensure the centre does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

The end of the criminal process

Risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same centre as the victim, the centre will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable. The centre will ensure that the victim and perpetrator remain protected from bullying and harassment (including online).

Where an alleged perpetrator is found not guilty or a case is classed as requiring 'no further action', the centre will offer support to the victim and alleged perpetrator for as long as is necessary. Staff will be aware that the victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The centre will discuss decisions with the victim and offer support. The alleged perpetrator will also be offered ongoing support if needed, as they have also been through a difficult and upsetting experience.

The Co-Headteacher will carefully consider, on a case-by-case basis, whether allowing the victim and the alleged perpetrator to share classes or attend the same activities is conducive to either party's effective education, and will implement alternative arrangements, in consultation with the DSL (and SENCO where the victim or alleged perpetrator has SEND), where necessary.

Ongoing support for the victim

Any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- The terminology the centre uses to describe the victim
- The age and developmental stage of the victim
- The needs and wishes of the victim
- Whether the victim wishes to continue in their normal routine
- The victim will not be made to feel ashamed about making a report
- What a proportionate response looks like
- The nature of the allegation, any power imbalance between those involved, and the risk of further abuse.
- Any physical, mental or emotional health needs arising from the incident, including access to specialist support where appropriate.
- Keeping support arrangements under regular review and identifying any wider patterns of concerning behaviour or cultural issues that may require further action.

Victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a step-by-step basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult.

Staff will be aware that victims may struggle in a normal classroom environment. Whilst the centre will understand that it is important not to isolate the victim, the victim may wish to be withdrawn from lessons and activities at times. The centre will ensure that this will only happen when the victim wants it to, not because it makes it easier to manage the situation. The centre will provide a physical space for victims to withdraw to.

The centre will be aware that victims may require support for a long period of time and will be prepared to offer long-term support in liaison with relevant agencies. The centre will ensure that everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made. If the victim is unable to remain in the centre, alternative provision or a move to another centre will be considered -- this will only be considered at the request of the victim and following discussion with their parents. If the victim does move to another centre, the DSL will inform the centre of any ongoing support needs and transfer the child protection file.

Ongoing support for the alleged perpetrator

Any decisions made regarding the support required for an alleged perpetrator will be made with the following considerations in mind:

- The terminology the centre uses to describe the alleged perpetrator
- The balance of safeguarding the victim and other children and providing the alleged perpetrator with education, appropriate safeguarding support and, where necessary, disciplinary sanctions
- The reasons why the alleged perpetrator may have abused the victim -- and the support necessary
- Their age and developmental stage, the nature of the allegations and any pattern or frequency of concerning behaviour
- What a proportionate response looks like
- Whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials
- What the outcome of the investigation was

When making a decision, advice will be taken from children's social care, specialist sexual violence services and the police as appropriate. If the alleged perpetrator moves to another centre, for any reason, the DSL will inform the destination centre of any ongoing support needs and transfer the child protection file.

If the reported abuse is found to have taken place, the centre will work with professionals, as required, to understand why the abuse took place and provide a high level of support to help the pupil understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again.

Disciplining the alleged perpetrator

Disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing will not prevent the centre reaching its own conclusion and imposing an appropriate penalty.

The centre will make such decisions on a case-by-case basis, with the DSL taking a leading role. The centre will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and children's social care will be consulted where necessary. The centre will also consider whether circumstances make it unreasonable or irrational for the centre 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. The centre will be clear whether action taken is disciplinary, supportive or both.

Shared classes

Once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on centre premises and on centre transport -- balancing the centre's duty to educate against its duty to safeguard. Decisions will be based on the centre's risk assessment, the wishes of the victim and the need to safeguard all children. The best interests of pupils will always come first.

Where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on centre premises and transport will be prevented.

Where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the centre would harm the education or welfare of the victim and potentially other pupils.

Where a criminal investigation into sexual assault leads to a conviction or caution, the centre will consider suitable sanctions and permanent exclusion. If the perpetrator remains at the centre, the centre will keep the victim and perpetrator in separate classes and manage potential contact on centre premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made.

Where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis.

In all cases, the centre will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents

In most sexual violence cases, the centre will work with the parents of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis.

The centre will meet the victim's parents with the victim present to discuss the arrangements being put in place to safeguard the victim, and to understand their wishes in terms of support arrangements and the progression of the report.

Centres will also meet with the parents of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or a deputy will attend such meetings, with agencies invited as necessary.

Clear policies regarding how the centre will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents.

Safeguarding other pupils

Pupils who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that pupils will "take sides" following a report, and the centre will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying, harassment and victimisation, including online.

The centre will keep in mind that contact may be made between the victim and alleged perpetrator, and that harassment from friends of both parties could take place via social media, and will do everything in its power to prevent such activity.

As part of the centre's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both the victim and alleged perpetrator. Centres will consider any additional support that can be put in place.

The whole-centre approach to safeguarding will make clear that there is a zero-tolerance approach to sexual harassment and sexual violence, that it is never acceptable, and it will not be tolerated. A robust preventative education programme will be implemented to help create an environment in which all pupils feel safe, supported and respectful of their peers, especially when reports of sexual harassment or sexual violence are made.

Monitoring and review

This policy will be reviewed **annually** and as required by the DSL and the Co-Headteacher.

Any changes made to this policy will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The next scheduled review date for this policy is **04/09/2027**.