

Charter.

**Better futures
for children &
young people.**

The Charter Schools Educational Trust

Child on Child Abuse (including harmful sexual behaviour) Policy

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Statement of Intent

The Charter Schools Educational Trust (the 'Trust') believe that a safe, caring and friendly environment in each of our schools creates a positive backdrop for effective teaching and learning, supports good mental health and wellbeing, and promotes equality and inclusion for all. We are committed to promoting a culture in which everyone feels confident about sharing any and all concerns they may have about their own safety and well-being or the safety and well-being of others.

The Trust recognises the rights and responsibilities of all members of its schools' communities, and therefore expect all pupils, parents, staff, trustees, governors and visitors to show due respect and courtesy to one another. Our primary concern is the safety, wellbeing and education of all pupils; actions taken in cases of poor behaviour are with the intention of supporting pupils' wellbeing and academic progress, as well as fulfilling the Trust's safeguarding responsibilities to pupils, staff and other members of its communities.

The Trust aims to foster a collective ethos amongst all members of its communities and promote the Trust values of Integrity, achieving together, inclusive and evidence informed.

All members of the Trust and its schools' communities must be treated inclusively and be free from any form of discrimination or prejudice.

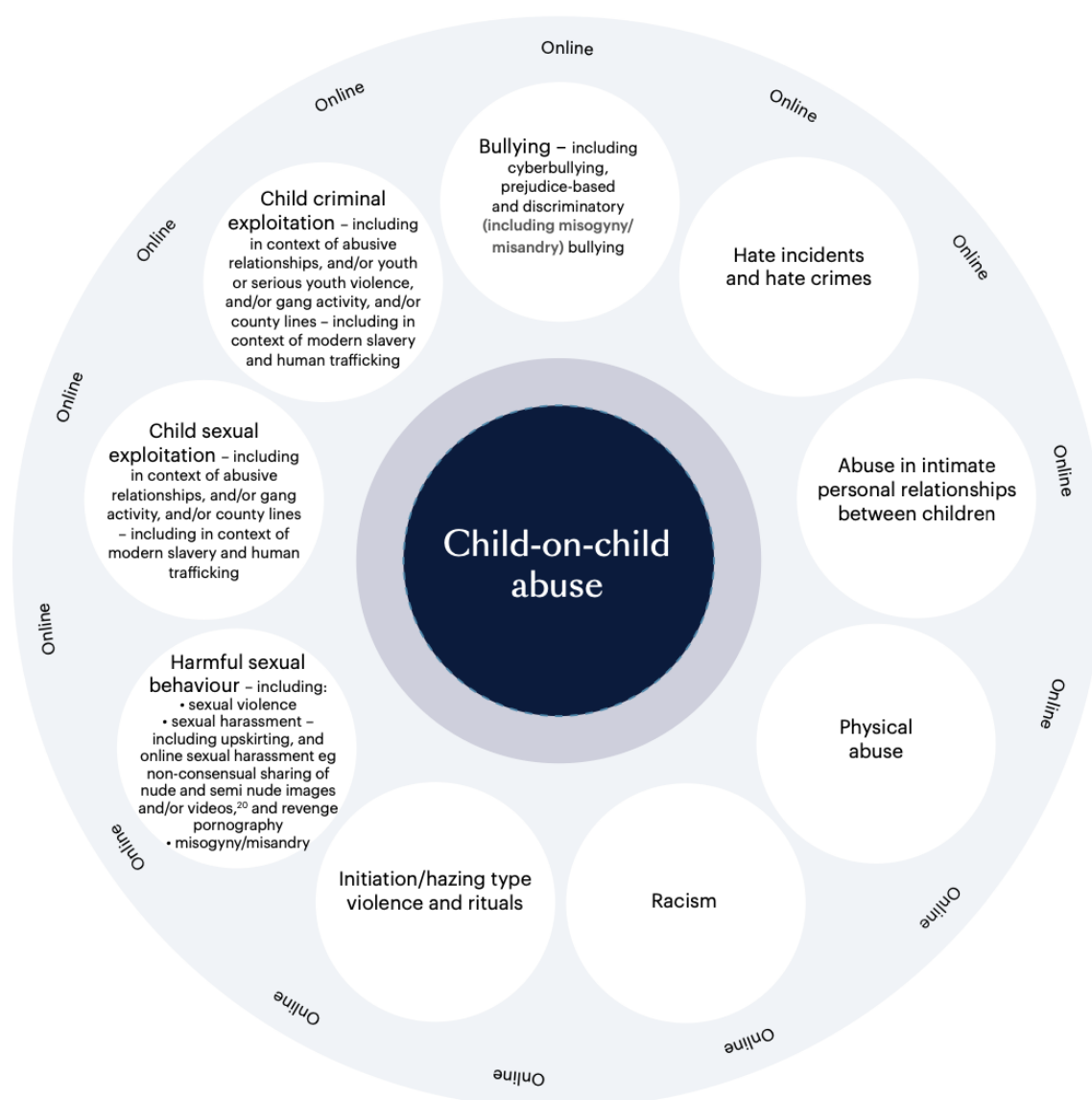
- All children, staff and visitors should feel safe in the school environment at all times through a high quality of care, support and guidance.
- All pupils have a right to fulfil their greatest academic and personal potential and feel they are valued members of our schools by both their peers and school staff, and should be free from bullying, discrimination, and distracting or damaging peer behaviour.
- Guidance on the use of reasonable force in certain circumstances when dealing with pupil behaviour will be agreed upon by the Headteacher and Local Governing Body, and clearly set out within the school specific Behaviour and Anti-Bullying policies.
- Rules will be consistently applied within our schools and where sanctions and punishments are exercised, they should be proportionate to the misdemeanour, and in line with the school specific Behaviour Policy.
- Good behaviour will be acknowledged and rewarded at the discretion of school staff, who will judge appropriately.
- In cases of problematic pupil behaviour, regardless of how sustained and disruptive, the individual pupil's out-of-school circumstances and possible special educational needs and disabilities will be considered. Comprehensive support will be provided before or alongside any disciplinary measures – exclusions and expulsions are to be used only as a last resort and where other intervention measures fail.
- Any kind of violence, threatening behaviour or abuse between pupils, or by pupils towards the school's staff, will not be tolerated and will result in a sanction, which could include a fixed term exclusion, and potentially a permanent exclusion following a full investigation.
- The Trust will ensure that those staff who work directly with children read at least Part one and those staff who do not work directly with children read either part one of DfE guidance "Keeping children safe in education" (KCSIE)
- We will also ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in part one of the guidance.

1. SCOPE

This policy sits within the suite of Trust safeguarding policies; it gives more detail about how we respond to child-on-child abuse. It gives further detail, within that, about how we will respond to harmful sexual behaviour.

Children, even primary school pupils are capable of abusing their peers. This can happen both inside and outside of school and online, and can take different forms. This policy details the school's approach to addressing those serious incidences that could be defined as child-on-child abuse (as detailed below in fig. 1)

Figure 1 – different types of child-on-child abuse



Child-on-Child abuse is defined within [KCSIE](#) (paragraph 33) but in summary is any kind of physical, sexual, emotional or financial abuse or coercive control between children/young people both on and offline.

Harmful sexual behaviour (HSB) is one way a child can abuse another child. We are adopting the NSPCC definition of HSB as: "Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult."

2. ROLES AND RESPONSIBILITIES

Introduction

The trustees, governors, senior leadership team, and all staff/volunteers at the Trust and its schools are committed to the prevention, early identification, and appropriate management of child-on-child abuse both within and beyond the school. We do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it. We recognise national and increasing concern about this issue and wish to implement this policy in order to mitigate harmful attitudes and child-on-child abuse in the school setting, taking appropriate and prompt action where needed.

Aims

Through this policy, as a safeguarding policy, we aim to:

- Identify the responsible individuals in the Trust or individual school and explain the purpose of their roles
- Outline the role of the Trust Board and the Local Governing Body of each respective school
- Describe the procedures to be followed if anyone in the Trust has a concern about the safety and welfare of a child who attends any school or other service or activity provided by the Trust

And in particular reference to child-on-child abuse:

- Raise awareness of the nature and level of risk to which our pupils are or may be exposed
- Increase understanding and appreciation that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up'
- Encourage the community to hold us to account if any of our pupils are feeling unsafe as a result of the behaviour of any of their peers.
- Encourage a whole school and community approach to preventing and responding to child-on-child abuse.
- Be compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education.

3. KEY PRINCIPLES

Our schools will minimise the risk of allegations against other pupils by:

- providing a developmentally appropriate PSHE/RSE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe,

- having systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued,
- delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk,
- developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils
- Ensuring that if such an incident takes place, we will identify immediately what can be done to make that area safer and act upon that.

Language

We will use the terms child and children and not the terms 'victim' and/or 'perpetrator' because research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers.

Curriculum

Our taught curriculum (particularly PHSE/RSE) that expands pupils' understanding of and value for diversity, we aim to prevent such incidences from occurring. The curriculum

- embeds representation of diverse groups across the curriculum
- teaches about and against prejudice
- identifies and challenges stereotypes
- broadens the range of what is deemed 'normal'
- develops young people's capacity for empathy

We have a carefully sequenced RSHE curriculum, based on the [Department for Education's \(DfE's\) statutory guidance](#), (2026) that specifically includes open discussion of topics that children and young people find particularly difficult.

Training

Our teachers work together and receive relevant training to ensure they are well equipped to deliver RHSE, to identify the early signs of child-on-child abuse, and to be able to uphold the expected standards in their responses to these issues set out in this policy. Our Designated Safeguarding Leads (DSLs) receive regular update training and protected time to carry out their duties. All staff receive training in line with 'Part 5: Child on child sexual violence and sexual harassment' of DfE guidance "Keeping children safe in education".

Systems and record keeping

We keep systematic records of such incidences on CPOMS/My Concern as part of our safeguarding procedures. These incidences are analysed to identify patterns and intervene early to prevent abuse. Our approach reinforces a culture where such incidences are not tolerated.

Vulnerable groups and links to barriers to disclosure

We recognise that all children can be at risk however we acknowledge that some groups are more vulnerable. This can include:

- experience of abuse within their family
- living with domestic violence

- young people in care
- children who go missing
- children with additional needs (SEN and/or disabilities)
- children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities Act 2010.
- children who are pregnant or are young parents
- children displaying early signs of abusive, violent, or harmful behaviour themselves, or those who experience frequent room removals, suspensions, or are on reduced timetables

We recognise that both boys and girls experience peer on peer abuse, but they do so in gendered ways.

What research tells us

- Under 18s are responsible for at least 1/3 of recorded sexual offences against children and young people in the UK
- while girls disproportionately experience specific types of HSB/harassment, boys and non-binary pupils also experience specific forms of peer abuse.
- girls are more likely to experience unwanted sexual touching in schools
- Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour.
- Boys report high levels of victimisation in areas where they are affected by gangs.
- Those with learning disabilities and autism also tend to be over-represented amongst young people who have displayed harmful sexual behaviour
- Around half of young people who have displayed harmful sexual behaviour have experienced sexual abuse themselves
- The vast majority of young people do not persist with these behaviours into adulthood

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

SERIOUS VIOLENCE AND WEAPONS

Physical assault, threatening behaviour, and the carrying or use of a weapon between children are forms of child-on-child abuse. They will be treated with the same seriousness, and responded to using the same principles of challenge, support and recording, as the other forms of abuse set out in this policy. This can be a safeguarding issue for both the child who is harmed and the child who has caused the harm.

Any member of staff who has a concern that a child is carrying, using, or has expressed any threat or intention to carry or use a weapon of any kind – regardless of whether an incident has yet taken place – must report this immediately to the SLT and DSL.

On receiving such a report, the SLT and DSL will:

- assess the level of risk to the child concerned and to others;
- take immediate action to safeguard anyone at risk, which may include a safeguarding separation (see Appendix Two);
- consider whether a referral to the police and/or children's social care is required;
- take steps, where safe to do so, to de-escalate conflict between the pupils involved; and
- consider whether wider contextual safeguarding risks (for example, gang association or exploitation) may be a factor.

We recognise that serious violence between children is more likely to occur immediately before and after the school day, and that pupils with a history of disrupted education, exclusion, or exploitation may be at heightened risk of involvement in serious violence, whether as the child harmed or the child causing harm. Where a pupil is identified as being at risk, we will consider targeted support in addition to any disciplinary response required under our Behaviour Policy, or any referral to the police if a crime has been committed.

Responding to incidences

Generic principles of responding to such incidences

- **Challenging** prejudicial behaviour, including setting standards of acceptable behaviour and a culture of trust and respect. Challenge includes explanation and information to help those responsible understand the impact and reflect but may also result in disciplinary action.
- **Supporting** all those affected by the incident (the target, person responsible, witnesses, participants, bystanders, families, staff and governors) to mitigate the impact and effect a change in behaviour including following up to ensure the incident has been effectively dealt with.
- **Recording** what has happened and report to relevant people. This will include informing the parents
- **Monitoring and analysing** reports to look for patterns to help direct further preventative measures
- **Evaluating** the intervention to learn and improve practice

We use the [Brook traffic light system](#) to support us in determining whether certain behaviours are deemed age appropriate (normal), or whether they are inappropriate and harmful. Brook gives us the types of behaviours that may come under each category. This, together with Simon Hackett's continuum of behaviour (2010) (below) is a useful guide to measure the behaviour that has occurred and consider the circumstances around the incident (s) and how serious it is.

Fig. 2 Hackett continuum 2010

Normal	Inappropriate	Problematic	Abusive	Violent
• Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making	• Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal	• Problematic and concerning behaviours • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity	• Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure victim compliance • Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence	• Physically violent sexual abuse • Highly intrusive • Instrumental violence which is physiologically and/or sexually arousing to the perpetrator • Sadism

Points to

consider when using the continuum:

(Please remember these are guides and do not deal in absolutes, it is vital that all circumstances are considered such as those listed below.)

- The wishes and feelings of the child that has been harmed
- Were there any witnesses?
- What are the ages and development of the children involved?
- Are there any additional vulnerabilities?
- Where did the incident take place?
- What was the explanation by all children involved of what occurred?
- What is each child's understanding of what occurred?
- Is this a repetition of a previous incident?
- Are these the same children involved? Is it the same child doing the harm but to different children?
- Are there ongoing risks to the child that has been harmed?
- Are there ongoing risks to the child that has been harming?

Reporting to the Police

(see section 13 in the Trust Child Protection and Safeguarding policy)

The school follows the advice '[When to call the police](#)' which covers incidents on school premises where pupils have potentially committed a crime. It provides guidance on what schools should bear in mind when considering contacting the police and aims to support schools to make defensible decisions when considering whether to involve the police. This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences

- Theft
- Weapons

4. HOW WE WILL DEAL WITH INVESTIGATIONS INTO INCIDENTS OF ANY TYPE OF HARM

(see sections 9 and 17 in the Trust Child Protection and Safeguarding policy)

Outlined in the safeguarding policy are the actions that all Trust staff will take when undertaking an investigation regarding any type of harm.

4.1 Recognition and disclosure

- Ensure there is plenty of time to listen and receive the disclosure – this will have your full attention
- Ensure you are somewhere private, safe and comfortable for the child, whilst keeping yourself (as the adult) safe also
- Remain calm and not overreact
- Allow the child/young person to speak freely
- Do not be afraid of silences
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- Do not automatically offer physical touch as comfort

4.2 Initial information gathering (unless a crime has been committed)

- If a crime has **not** been committed – Gather the **facts** – do not ask leading/investigative questions, use open and consistent language, use the voice of the child (taking direct quotes where appropriate)
- Do not promise confidentiality
- If you are asking a child to write something down this is an account (not a statement)
- Tell the child/young person what will happen next – that you will pass the information on to the DSL

4.3 Decision making

- Decide on the next course of action – if the child is in need of immediate protection or at risk of significant harm always immediately report your concern by CPOMs/MyConcern **and** face to face to the DSL or in their absence a Deputy DSL.
- In the case of an allegation against a member of staff talk to the Headteacher. In their absence contact Cassie Buchanan (Trust Chief Executive)
- Staff may also share information directly with children’s social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies, the headteacher or the Trust Chief Executive are not available, and a referral is required immediately.
- Informing Parents? - The school will normally seek to discuss any concerns about a pupil with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are notified. Further guidance is detailed in [Understanding and dealing with issues relating to parental responsibility](#)

- There may be occasion to apply the Gillick competency for example, if a child or young person:
 1. would like to have therapeutic support but doesn't want their parents or carers to know about it
 2. is seeking confidential support for substance misuse
 3. has strong wishes about their future living arrangements which may conflict with their parents' or carers' views.
 4. Further guidance from the NSPCC is [here](#) ,

5. HOW WE WILL DEAL WITH INCIDENCES OF CHILD-ON-CHILD ABUSE.

*With these particular incidences the core investigation is managed differently – we will follow all the steps in our policy above **PLUS the ones below.***

Our steps follow the [London Child Protection Procedures](#)

Just as the child's behaviours are on a continuum of seriousness and harm, the response given is also on a continuum. The NSPCC document '[Responding to children who display sexualised behaviour](#)' gives additional guidance on how to respond.

5.1 Recognition and disclosure (in addition to the above)

- Recognise that these types of behaviours may be as a result of being a victim of abuse themselves.
- If the child coming to you is the child who has harmed, they need reassurance and support that they will be kept safe also.

5.2 Initial information gathering (in addition to the above)

- **Has a crime been committed? – if yes, this has a different response, call the police, if you start investigating yourself this may jeopardise any criminal proceedings**
- If the DSL receiving the disclosure, is unsure how to respond, they must seek support, from external agencies as well as making the usual referrals where appropriate.
- If a pupil is accused of a serious safeguarding breach, **before the pupil is spoken to**, the Trust have committed to calling the parents/carers so that they have the option of attending to support their child whilst staff speak to them.

5.3 Decision making

- **Do social care need to be called because the child is at risk of significant harm? -**
Adults must consider whether there is a risk the child with the harmful behaviour poses a significant risk to their own siblings, other children and/or adults. The child with the harmful behaviour may have considerable need themselves and may also be or have been the victim of abuse.
- Once the facts have been gathered in the disclosure, triangulate with what you know about the child, their family, the situation, using Hackett's continuum to help and support with the risk assessment
- Seek advice from social care where appropriate
- Informing the parents – (see above)

5.4 Strategy for what happens next

- Social care may direct a statutory referral, in which case the school becomes part of the wider safeguarding team (under Section 17 or Section 47); these will be categorised as 'red' (see Appendix One).
- If the situation does not meet the threshold for statutory children's social care intervention, the school must consider its response under green or amber categories (see Appendix One). This may include a referral to local **Family Help** pathways or specialist community-based support services for anyone involved.
- Is a written risk assessment needed along with a safety plan? If not, why not? In your written records, you must clearly state your reasoning (see Appendix Two).
- At this stage, communicate directly with parents face-to-face where appropriate.

5.5 Action planning monitoring and review

- If needed – write the risk assessment and safety plan, informing parents of these documents (see below for details)
- The risk assessment may point to the need for a safeguarding separation – this is where pupils are physically kept apart for a period of time, either on the school site (if this is possible) or on separate sites. (see appendix 2)
- Follow the follow-up procedures (below)

6. KEEPING WRITTEN RECORDS OF THE EVENTS AROUND THE DISCLOSURE

All concerns, discussions and decisions made, and the reasons for those decisions will be recorded, kept confidential, and stored securely on CPOMS/My Concern. This is the single source of all information relating to safeguarding.

Records should include:

- All concerns
- A record of all emails, phone calls and conversations related to the concern
- Details any follow up action taken, decisions reached and the outcome for each concern
- All day-to-day email, phone calls and documentation related to any pupil about which a concern has been raised or is about to be raised
- All email, phone calls and documentation related to any meetings with safeguarding partners, organisations providing support, or those individuals

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy) but in the interim record the matter in CPOMS/MyConcern

Follow Up - For the Young Person Who Has Been Harmed

What support they require depends on the individual e.g. counselling, a mentor or they may feel that they can deal with it on their own or with support of friends/family. We will always engage in restorative justice techniques and will continue to monitor the situation and people involved.

If the victim feels very unsafe/vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to, support strategies for managing future issues and identified services to offer additional support.

Follow up - For the Young Person Who Has Displayed Harmful Behaviour

It is important to find out why the young person has behaved in such a way, one to one mentoring or counselling may also be necessary. It is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice, or it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. (see safeguarding separation Appendix 2) In which case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment (RAMP) may be required (see appendix). This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a punishment as a consequence such as exclusion or internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

Follow up - After Care for both

After the conclusion of the incident, we will continue to support both parties involved. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

We may also consider a safety plan which consider the behaviours that may be risky and plan ways to manage triggers and to seek support from adults and peers. These plans are designed to support pupils in feeling secure in the school and identify and manage feelings, situations that leave them feeling anxious.

The plans are completed with the parents, staff and the pupil (depending on their age)

The language of safety planning is more positive than risk assessment and can give security to the child that a joined up approach is being followed by all in school. (see appendix)

7. RESPONSE FOR SPECIFIC TYPES OF INCIDENTS

7.1 Child sexual exploitation (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are:

- going missing for periods of time or regularly coming home late
- regularly missing school or education or not taking part in education

- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- having new and/or older friends
- displaying inappropriate sexualised behaviour.

It is a criminal offence for anyone to be involved in any sexual act (sexual intercourse, sexual touching, kissing etc) with anyone under the age of 13 whether the young person agrees or not, on the basis that anyone under 13 lacks the capacity to give valid consent to any sexual act.

Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual exploitation is available in the DfE guidance: [Child sexual exploitation: guide for practitioners](#).

What we will do

Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, whether or not they are a pupil in our schools, this will result in an immediate referral to Children's Services.

7.2 FINANCIALLY MOTIVATED SEXUAL EXTORTION ('SEXTORTION')

This is a form of online child sexual abuse in which a child is deceived, coerced or blackmailed – often by someone posing online as a peer or love interest – into sending an intimate image or video of themselves, and is then threatened with the image being shared unless money is paid. This can escalate very quickly, sometimes within hours, and has in some cases been linked to serious harm, including suicide.

What we will do

- Any disclosure of this nature is treated as an extreme and time-critical safeguarding concern and passed to the DSL immediately.
- Staff will reassure the child that they are not in trouble, that this is a crime committed against them, and that they will be supported.
- The child will not be pressured or encouraged to pay the individual(s) responsible, or to send further images.
- We will refer to the police and, where appropriate, children's social care without delay, given the fast-moving nature of this form of abuse.
- We will support the child and family to report the account and content, and to use the CEOP reporting tool and Report Remove (Childline/Internet Watch Foundation) to seek removal of the image.
- We will consider the pastoral and mental health support the child may need, given the acute distress this abuse can cause.

7.3 Self-Generated Intimate Images and/or Videos (including those generated using AI, e.g. deepfakes)

This includes images or videos that have been generated or manipulated using artificial intelligence – for example, deepfakes – whether or not the child depicted took part in creating them, and regardless of whether the content is sexually explicit or presented as such.

A judgement of whether content is intimate or sexual in nature is both a value judgement and dependent on context.

What types of incidents are covered by the Child-on Child abuse policy?

Yes:

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

No:

- The sharing of sexual imagery of children by adults constitutes child sexual abuse and schools should 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
- Sexual imagery downloaded from the internet by a child and shared with a peer (also under the age of 18) or an adult

These would be addressed under the processes detailed in the Trust Child Protection Policy

What we will do

An incident involving youth involved sexual imagery is considered 'extreme' and will be referred to the DSL. The DSL will follow the procedures and guidance set out in, UK Council for Internet Safety (UKCIS) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'.

- there should be subsequent interviews with the children involved
- Where youth produced sexual imagery is involved, the Trust have committed to calling the parents before any discussion with the pupil accused, so they can be in attendance to support their child if they choose to, when staff are asking them about what happened 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, we will refer to social care and/or the police
- any report to the police will be considered against the severity of the concerns and/or allegations.

The school will consider the following when assessing the severity of the concerns/allegations:

- the impact on any child who has allegedly experienced the abuse,
- Was production consensual or coerced?
- Was sharing consensual?
- Was production volunteered or requested?
- What are the ages of the children involved?

7.4 Issues to do with consent, pestering, harassment, jokes and 'banter' between children (see part 5 of KCSIE)

These can occur between any two children, or between groups of children. It can occur online and offline (both physically and verbally) and those who experience it will likely find it stressful

and distressing. "It's just banter" is used to excuse rude / prejudiced based behaviour. It uses social pressure to mark children out as outsiders, a 'rainer-on-parades', a 'tiresome downer on a good time who can't take a joke'. One pupil described it as '.....VERY effective at shutting you up and making you feel small.' This persistent belittling, criticism and name-calling is seen as a form of emotional abuse.

MISOGYNY

We recognise that misogyny – attitudes, behaviours and language that demean, objectify or express hostility towards girls and women – is a significant driver of harmful sexual behaviour, sexual harassment and sexual violence between children. Left unchallenged, everyday misogynistic attitudes, jokes and 'banter' can normalise more serious harmful behaviour over time.

Staff will not dismiss sexist comments, jokes, or the rating/ranking of pupils' appearance as harmless or age-typical. These are addressed using the same challenge-and-support approach set out elsewhere in this policy, with the response proportionate to the seriousness and pattern of the behaviour, using Hackett's continuum to guide judgement.

Our RSHE curriculum explicitly addresses misogyny and challenges gender stereotypes, and staff training includes guidance on recognising and responding to misogynistic attitudes, including where these are expressed online. We recognise that misogyny can also be directed towards boys and can intersect with other forms of prejudice; staff should remain alert to this.

- "People at school have been calling me "gay" and "queer" and saying I'm "a girl". I feel sick and scared of going into school. How can they know I'm gay when I don't know myself yet?"
- Boys giving girls marks out of 10 based on their physical appearance while they were travelling to and from school together.
- Reinforcing gender stereotypes e.g 'you run like a girl'
- "Sometimes the people that you chill with want you to do certain things that you don't want to do, but you have to do it because you're part of that group, you're part of it"
- Unwanted, unwelcome physical contact, such as touching, bumping, grabbing, or patting
- Intimidating behaviour in any part of the school, but particularly round the toilets, in the corridors, hallways, stairs, which can include demeaning nicknames, homophobic name calling, cat calls, 'rating'.
- Pulls clothing e.g. pulls down your trousers, flips your skirt*, lifts your shirt, etc. or grabs at you, or tries to, so they can see or touch any part of your body.
- Blocking someone's path so they can't get away from the harassment, jokes, banter
- Trying to kiss someone without consent or touching someone's bottom/breasts/genitalia without consent.

***Upskirting (similar to 'downblousing')**

Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). **It is a criminal offence** under the Voyeurism Act for which the perpetrator can be prosecuted.

Anyone, and any gender, can be a victim and this behaviour is completely unacceptable.

What will we do

All such incidences are defined as extreme according to our behaviour policy and are dealt with by a member of SLT, who will inform the DSL

- there should be subsequent interviews with the children involved
- Where upskirting/downblousing is involved, the Trust have committed to calling the parents before any discussion with the pupil accused, so they can be in attendance to support their child if they choose to, when staff are asking them about what happened.
- parents should be informed (at an early stage if appropriate) and involved in the process
- Support for both children put in place to ensure both are protected – this may include a referral to external agencies (like social care or the police)
- We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If one of the party's involved moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff.
- We will issue any sanction deemed necessary

8. This policy should be read in conjunction with the following:

- Respective School Behaviour Policy
- Trust Suspensions and Exclusions policy
- Trust and school child protection policies
- Confiscation and Search policy
- Restrictive interventions poolicy
- [OFSTED review](#) into sexual abuse in schools (June 2021)
- [KCSIE](#)
- [Pro-forma RAMP](#) (scroll down to appendices)
- [Pro-forma Safety Plan](#) (see page 17 of the linked document for the template)
- [Brook Traffic Light](#) system for sexual behaviours

Appendix One

Responding to children who display sexualised behaviour

It's important to be able to distinguish developmentally typical sexual behaviours from those that may be problematic or harmful, and make sure children get appropriate support. Always consider the child's holistic needs and safeguarding concerns alongside any sexualised behaviour and follow due procedures accordingly. This guide is a tool to support objective decision making about a child or young person's sexual behaviour and does not replace professional judgement or policy and legislation. Visit nspcc.org.uk/hsb for more information.

Need advice?

Contact our helpline for advice and support:

- Call **0808 800 5000**
- Email help@nspcc.org.uk
- Visit nspcc.org.uk/helpline

Childline

For children who need further support our free, confidential helpline is available 24/7:

- Call **0800 1111**
- Visit childline.org.uk

Developmentally typical		Problematic		Harmful	
Hackett Continuum					
Normal	Inappropriate	Problematic	Abusive	Violent	
• Developmentally expected and socially acceptable behaviour • Consensual, mutual and reciprocal • Decision making is shared	• Single instances of developmentally inappropriate sexual behaviour • Behaviour that may be socially acceptable within a peer group but not in wider society • May involve an inappropriate context for behaviour that would otherwise be considered normal	• Developmentally unusual and socially unexpected behaviour • May be compulsive • Consent may be unclear and the behaviour may not be reciprocal • May involve an imbalance of power • Doesn't have an overt element of victimisation	• Intrusive behaviour • May involve a misuse of power • May have an element of victimisation • May use coercion and force • May include elements of expressive violence • Informed consent has not been given (or the victim was not able to consent freely)	• Physically violent sexual abuse • Highly intrusive • May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator • May involve sadism	
How to respond • Although green behaviours are not concerning, they still require a response • Listen to what children and young people have to say and respond calmly and non-judgementally • Talk to parents about developmentally typical sexualised behaviours • Explain how parents can positively reinforce messages about appropriate sexual behaviour and act to keep their children safe from abuse • Signpost helpful resources like our 'Talk PANTS' activity pack: nspcc.org.uk/pants • Make sure young people know how to behave responsibly and safely	How to respond • Amber behaviours should not be ignored • Listen to what children and young people have to say and respond calmly and non-judgementally • Consider the child's developmental age as well as their chronological age, alongside wider holistic needs and safeguarding concerns about the problematic sexualised behaviour • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who can be notified and will provide support • Consider whether the child or young person needs therapeutic support and make referrals as appropriate		How to respond • Red behaviours indicate a need for immediate intervention and action • If a child is in immediate danger, call the police on 999 • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who should be notified and will provide support • Typically referrals to children's social care and the police would be required. Referrals to therapeutic services should only be made once statutory services have been informed and followed due procedures		

Appendix Two – Safeguarding Separation (from the Restrictive Intervention Policy January 2026)

What is a safeguarding separation?

This is a non-disciplinary, protective measure used to manage risks and ensure the welfare of the school community. It confirms the school's "general management powers" to separate a pupil/s for the purpose of safeguarding, distinct from "directing off-site to improve behaviour" under Section 29A.

A safeguarding separation may be used in circumstances including, but not limited to:

- Child on Child Abuse: To separate pupils during an active investigation.
- Risk to Safety: When a pupil's presence in a specific area or classroom poses an immediate safeguarding risk to themselves or others and this is unlikely to be resolved quickly.
- Operational Practicality: (where the separation is directed to be off site) Where the school site does not allow for sufficient physical distance between parties involved in a serious safeguarding concern.

How does a safeguarding separation work in practice?

Procedural Framework – on site separation

The school will adhere to the following standards when a safeguarding separation is enacted:

- Be put in place only by the school's headteacher /executive headteacher, after a review of current risk assessments and behaviour plans as a mechanism to keep the whole school community safe– it's protective in nature rather than a punitive. If the pupil is on site the registration is as normal.
- Headteacher/EHT (possibly with SENCO) will communicate the reason for the separation, if it is on the school site, with the parents and spend time going through exactly how the separation will work. This includes:
 - Explaining the room to be used and how it will be set up
 - Explaining who will be supervising the pupil and which member of SLT will be overseeing that
 - Explaining how learning will be planned and adjusted for the pupil, particularly for those with EHCPs
 - Explaining what will happen during break and lunch times
 - Whether learning such as PE (including swimming) DT, Art, Science that requires specialist spaces and equipment, will be on the pupil's timetable during the separation
 - Whether the pupil will be able to attend any trips or visits with others

- Procedural Framework – off site separation

If the risk assessment demonstrates that the pupils can only be kept separate and safe by one child being off site, then the bullet points above will be considered in that context. We will liaise with the local authority to consider alternatives

If the pupil is off site the registration code is B

Guiding principles around separations:

- Safeguarding & SEND Safeguards
 - **The Best Interests Principle:** In line with Keeping Children Safe in Education (KCSIE), the best interests of the children involved will be the primary consideration.
 - **SEND Adjustments:** If a pupil has an Education, Health and Care Plan (EHCP), the SENCO and Designated Safeguarding Lead (DSL) will jointly review the separation to ensure "reasonable adjustments" are met and that the separation does not cause undue distress or trauma.
- Duration: There is a fixed time frame that is clearly communicated to all stakeholders, including the pupil, from the outset. The timeframe will depend on the circumstances, the risk assessment and what eventual outcome is being worked towards. There must be plans for monitoring, review and reintegration. (If it were later found that the separation needed to be extended this should be clearly communicated and explained). A safeguarding separation is not indefinite.

A Safeguarding Separation will conclude when:

- An investigation is completed and a long-term plan (e.g., managed move, reintegration, or permanent exclusion) is decided.
- A revised risk assessment concludes that the parties can safely occupy the same space.
- The Local Authority provides alternative long-term provision.
- Communication: Every part of the process should be documented to ensure that all stakeholders are clear on what is happening and why. If re-integration occurs, a reintegration meeting happens in the usual way.

