



## Child on Child Abuse Policy

<b>Persons responsible</b>	DSL/DDSL
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## 1. Introduction and Aims

This policy further specifies any issue that could constitute child on child abuse. It relates to, and should be read alongside, the School's Child Protection and Safeguarding Policy and any other relevant policies including, but not limited to, bullying (including cyber-bullying), online safety, IT use, data protection and retention of records, children missing in education, student behaviour and discipline. If relevant, it should be read, according to the concern(s) or allegation(s) raised, in conjunction with the DfE's advice on *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges* (DfE's Advice) (May 2018), and Bromley Safeguarding Children Partnership Policy and Procedures (BSCP)

The aims of this policy are to:

- set out our strategy for improving prevention, and identifying and appropriately managing child on child abuse.
- ensure that it continually addresses the risks to which students are or may be exposed.
- recognise that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up',
- be compliant with the statutory guidance on child on child abuse as set out in *Keeping Children Safe in Education*
- take a safeguarding approach to all individuals involved in concerns or allegations about child on child abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter.
- uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18.

## The School's Responsibilities

The Governors, Senior Leadership Team, and all staff (including clubs and volunteer staff members) at St Christopher's The Hall School, henceforth know as, the School, are committed to the prevention, early identification, and appropriate management of child on child abuse (as defined below), both within and beyond the School.

In particular, we:

**(a) believe that in order to protect children, we should:**

- be aware of the nature and level of risk to which our pupils are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context
- take a whole-school community Contextual Safeguarding approach to preventing and responding to child on child abuse (see section 2 below for an explanation)

**(b) regard the introduction of this policy as a preventative measure.**

- we do not feel it is acceptable merely to take a reactive approach to child on child abuse in response to alleged incidents of it
- we believe that in order to tackle child on child abuse proactively, it is necessary to focus on all four of the following areas:
  - 1) systems and structures
  - 2) prevention

- 3) identification
- 4) response/intervention

**(c) recognise a national 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,**

**(d) encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the School so that it can ensure that appropriate and prompt action is taken as a response.**

## 2. What is A Contextual Safeguarding Approach?

A Contextual Safeguarding approach is about changing the way that professionals approach child protection when risks occur outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children may have encountered child on child abuse.

This policy adopts a whole-school community Contextual Safeguarding approach, which means:

- being aware of and seeking to understand the impact that these wider social contexts may be having on our pupils
- creating a safe culture in the School by, for example, implementing policies and procedures that address child on child abuse and harmful attitudes; promoting healthy relationships and attitudes to gender/ sexuality; hotspot mapping to identify risky areas in the School; training on potential bias and stereotyped assumptions,
- being alert to and monitoring changes in students' behaviour and/or attendance
- contributing to local child protection agendas by, for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies (see section entitled 'multi-agency working').

## 3 Understanding Child on Child Abuse

### 3.1 What is Child on Child Abuse?

For these purposes, child on child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, and within children's relationships (both intimate and non intimate), friendships and wider peer associations.

Child on Child abuse can take various forms, including (but not limited to): serious bullying (including cyber bullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or prejudice-based violence including, but not limited to, gender-based violence.

Examples of online child-on-child abuse would include sexting, online abuse, child on child grooming, the distribution of youth involved sexualised content, and abuse.

## **(i) Physical Abuse**

This may include hitting, kicking, nipping/pinching, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

## **(ii) Sexual Violence and Sexual Harassment**

This must always be referred immediately to the Designated Safeguarding Lead

The DSL will follow the DfE Guidance: Sexual violence and sexual harassment between children in schools and colleges Sept 2021 with consideration of:

- Managing internally
- Early Help
- Children and Families Hub referral
- Reporting to the police

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as to the young person it is intended towards. Sexually harmful behaviour may include:

- inappropriate sexual language
- inappropriate role play
- sexual touching
- sexual assault/abuse.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Upskirting: (see definition below - (v))

## **(iii) Bullying**

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both young people who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

- An Imbalance of Power: Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.
- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

#### (iv) Online Bullying

Online Bullying is the use of technology (social networking, messaging, text messages, e-mail, chat rooms etc.) to harass, threaten or intimidate someone for the same reasons as stated above.

Online bullying can take many forms:

- Abusive or threatening texts, emails or messages
- Posting abusive comments on social media sites
- Sharing humiliating videos or photos of someone else
- Stealing someone's online identity
- Spreading rumours online
- Trolling – sending someone menacing or upsetting messages through social networks, chat rooms or games
- Developing hate sites about another person
- Prank calls or messages
- Group bullying or exclusion online
- Anonymous messaging
- Encouraging a young person to self-harm
- Pressuring children to send sexual messages or engaging in sexual conversations

#### (v) Sexting / Sharing Nudes or Indecent Imagery

The term 'sexting' relates to the sending of indecent images, videos and/or written messages with sexually explicit content; these are created and sent electronically. They are often 'shared' via social networking sites and instant messaging services.

**Upskirting:** where someone takes a picture under a person's clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

This must always be referred immediately to the Designated Safeguarding Lead DSL will follow the UKCIS: Sexting in schools and colleges 2016 guidance.

## **(vi) Initiation/Hazing**

Hazing is a form of initiation ceremony which is used to induct newcomers into an organisation such as a private school, sports team etc. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The ceremony welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

## **(vii) Prejudiced Behaviour**

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – for example disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity.

## **(viii) Teenage Relationship Abuse**

Teenage Relationship Abuse is a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner. This abuse may be child sexual exploitation.

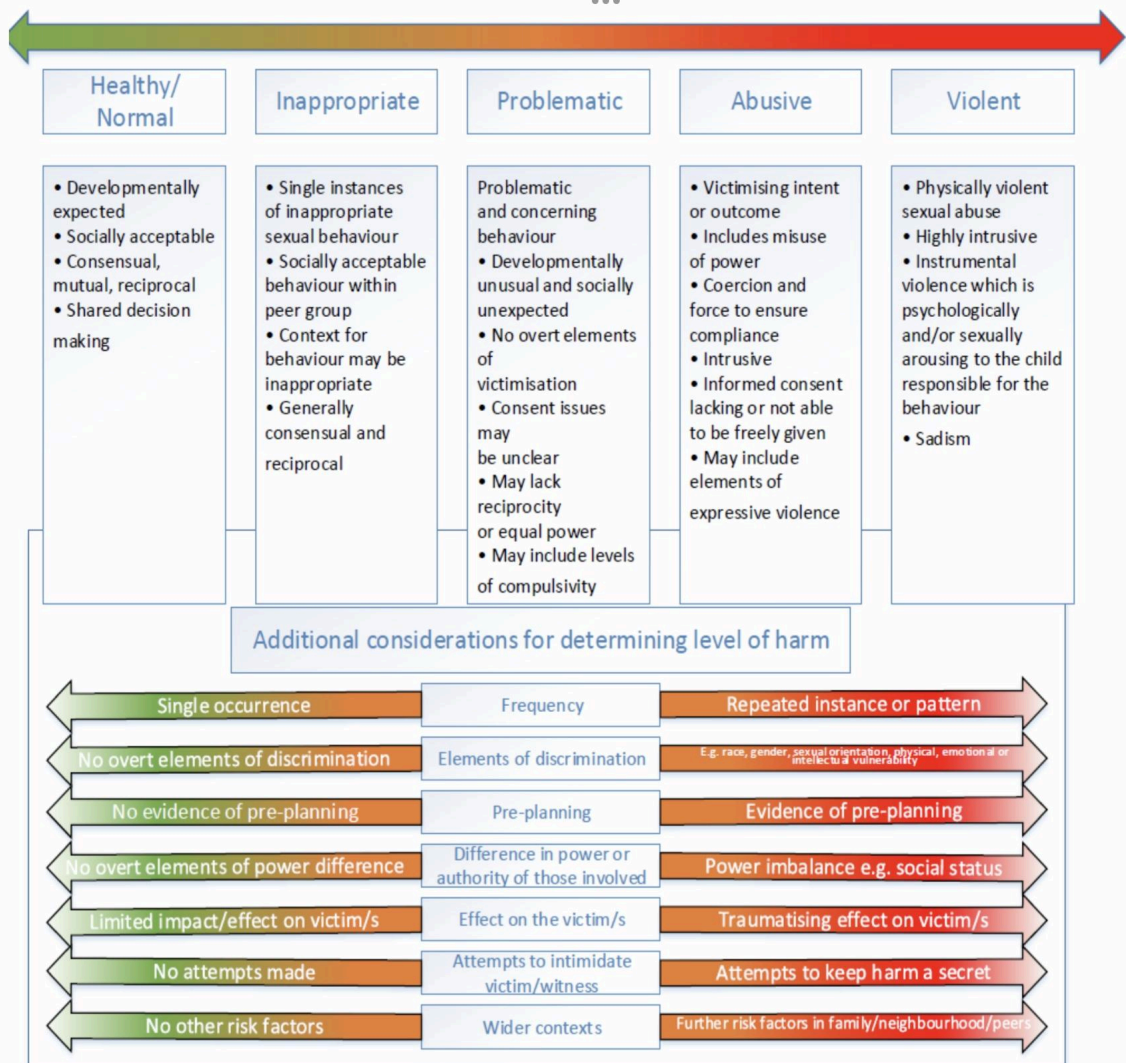
# **4. Understanding Behaviour and how to respond to it**

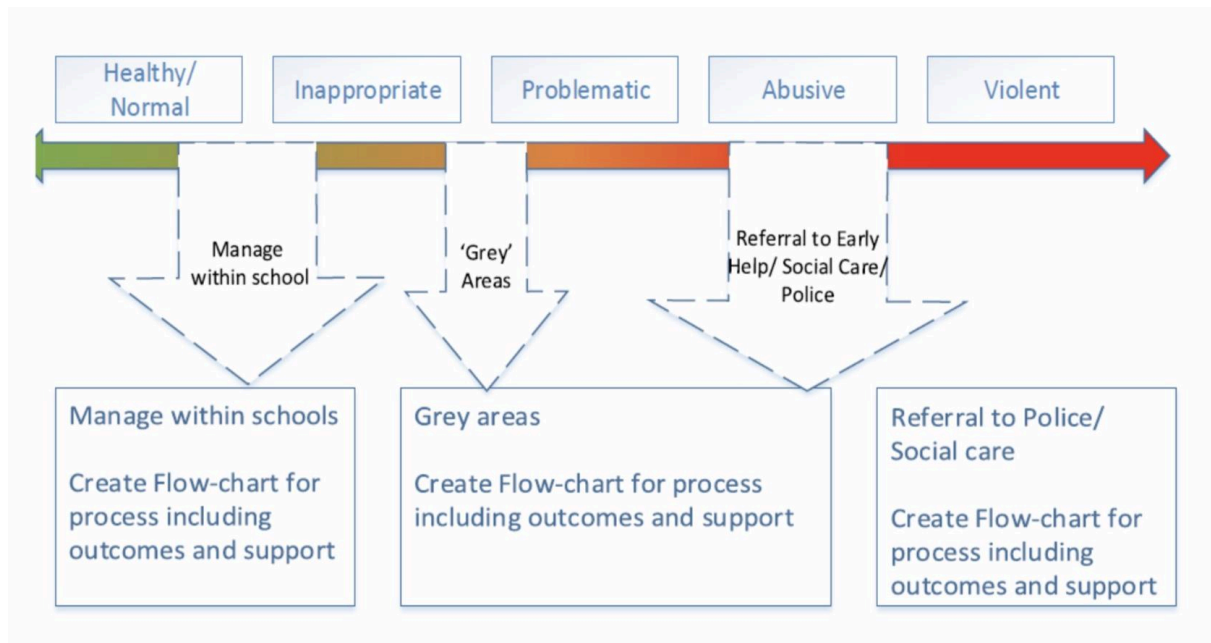
## **4.1 Sexual Behaviour**

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



Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	<ul style="list-style-type: none"> <li>Single instances of inappropriate sexual behaviour</li> </ul>	<ul style="list-style-type: none"> <li>Problematic and concerning behaviours</li> </ul>	<ul style="list-style-type: none"> <li>Victimising intent or outcome</li> </ul>	<ul style="list-style-type: none"> <li>Physically violent sexual abuse</li> </ul>
Socially acceptable	<ul style="list-style-type: none"> <li>Socially acceptable behaviour within peer group</li> </ul>	<ul style="list-style-type: none"> <li>Developmentally unusual and socially unexpected</li> </ul>	<ul style="list-style-type: none"> <li>Includes misuse of power</li> </ul>	<ul style="list-style-type: none"> <li>Highly intrusive</li> </ul>
Consensual, mutual, reciprocal	<ul style="list-style-type: none"> <li>Context for behaviour may be inappropriate</li> </ul>	<ul style="list-style-type: none"> <li>No overt elements of victimisation</li> </ul>	<ul style="list-style-type: none"> <li>Coercion and force to ensure victim compliance</li> </ul>	<ul style="list-style-type: none"> <li>Instrumental violence which is physiologically and/or sexually arousing to the perpetrator</li> </ul>
Shared decision making	<ul style="list-style-type: none"> <li>Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>Consent issues may be unclear</li> </ul>	<ul style="list-style-type: none"> <li>Intrusive</li> </ul>	<ul style="list-style-type: none"> <li>Sadism</li> </ul>
		<ul style="list-style-type: none"> <li>May lack reciprocity or equal power</li> </ul>	<ul style="list-style-type: none"> <li>Informed consent lacking, or not able to be freely given by victim</li> </ul>	
		<ul style="list-style-type: none"> <li>May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>May include elements of expressive violence</li> </ul>	





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

## 4.2 Other Behaviour

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable within the peer group
- involves a single incident or has occurred over a period of time
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability,
- involves an element of coercion or pre-planning,
- involves a power imbalance between the child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power, and
- involves a misuse of power.

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child on child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

## 4.3 Vulnerability to Abusing or Being Abused

Any child can be vulnerable to child on child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children.

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

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

Research suggests that:

- Child on child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of child on child abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender- imbalanced environments
- Children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND. These can include:
  - ❖ assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration
  - ❖ the potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs,
  - ❖ communication barriers and difficulties, and overcoming these barriers.
- some children may be more likely to experience child on child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

## 5. How Prevalent is Child on Child Abuse?

Research suggests that child on child abuse is one of the most common forms of abuse affecting children in the UK. For example, more than four in ten teenage school girls aged between 13 and 17 in England have experienced sexual coercion. Two thirds of contact sexual abuse experienced by children aged 17 or under was committed by someone who was also aged 17 or under.

## 6. A whole school approach

### 6.1 School environment

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

- educating all governors, SLT, staff, pupils, and parents about this issue. This includes: training all governors, SLT, and staff on the nature, prevalence and effect of child on child abuse, and how to prevent, identify, and respond to it. This includes:
  - (i) Contextual Safeguarding
  - (ii) the identification and classification of specific behaviours, including digital behaviours
  - (iii) the importance of taking seriously all forms of child on child abuse (no matter how 'low level' they may appear) and ensuring that no form of child on child abuse is ever dismissed as horseplay or teasing
  - (iv) social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.
- educating children about the nature and prevalence of child on child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider curriculum. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
- They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of child on child abuse. Educating students about consent includes teaching them basic facts such as:
  - (i) a child under the age of 13 can never consent to any sexual activity
  - (ii) the age of consent is 16; and
  - (iii) sexual intercourse without consent is rape
- engaging parents on these issues by:
- talking about them with parents, both in groups and one to one,
- asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks
- encouraging parents to hold the School to account on this issue, in part as a result of visibility of this policy.
- supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school support from the Mental Health Lead to address underlying mental health needs. All staff are trained to meet low-level mental health difficulties within the students
- working with governors, SLT, and all staff, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community,
- creating conditions in which our pupils can aspire to, and realise, safe and healthy relationships fostering a whole-school culture which is founded on the idea that every member of the School's community is responsible for building and

maintaining safe and positive relationships, and helping to create a safe school environment in which:

- violence and abuse are never acceptable
- the importance of these relationships is maintained in providing students with a sense of belonging, which could otherwise be sought in problematic contexts,
- pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to
- we proactively identify positive qualities in our pupils
- we nurture these positive qualities in our pupils
- we teach and encourage our pupils to think about positive hopes for the future
- we support our pupils in developing small-scale goals that enable realistic ambitions
- responding to cases of child on child abuse promptly and appropriately
- ensuring that all child on child abuse issues are fed back to the School's safeguarding team so that they can spot and address any concerning trends and identify students who may be in need of additional support. This is done by way of a weekly staff meeting at which all concerns about students (including child on child abuse issues) are discussed challenging the attitudes that underlie such abuse (both inside and outside the classroom).
- enabling pupils to be able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training.

## 6.2 Multi-agency working

The School actively engages with Bromley Safeguarding Children's Partnership (BSCP) in relation to child on child abuse, and works closely with, for example, children's social care, the police, the LADO, Children and Families Hub, Bromley Mental Health and and Emotional Wellbeing Network, and other relevant agencies in accordance with BSCP.

The relationships the School has built with these partners are essential to ensuring that the School is able to prevent, identify early, and appropriately handle cases of child on child abuse. They help the School to:

- (a) develop a good awareness and understanding of the different referral pathways that operate in our local area, as well as the preventative and support services which exist
- (b) ensure that our pupils are able to access the range of services and support they need quickly
- (c) support and help inform our local community's response to child-on-child abuse
- (d) increase the School's awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our pupils.

## 7. Responding to Concerns or Allegations of Child-on-Child Abuse

### 7.1 General Principles

It is essential that all concerns and allegations of child on child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can



have a significant impact on our School environment.

Any response should:

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation
- treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The School should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter
- It should take into account:
  - that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk
  - the potential complexity of child on child abuse and of children's experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting
  - the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/ children and their parents, and obtain consent to any referral before it is made. The School should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported

## 7.2 Reporting a Concern

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay (in accordance with our Child Protection Policy) so that a course of action can be agreed.

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

**Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (see Section 6.1 of the Child Protection Policy).**

If a child speaks to a member of staff about child on child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language

that demonstrates understanding rather than judgement. For further details please see the procedures set out in section 5.4 of the Child Protection Policy.

### 7.3 Responding to a Concern

The DSL will discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, to seek specialist help in preventing the images spreading further and removing the images from the internet.

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

The DSL will always use their professional judgement to:

- (a) assess the nature and seriousness of the alleged behaviour
- (b) determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required.

In borderline cases, the DSL may wish to consult with children's social care and/or LADO, or the Children and Families Hub team, and/or other relevant agencies in accordance with the BSCP, on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL should contact children's social care and/or the police immediately and, in any event, within 24 hours of the DSL becoming aware of the alleged behaviour. The DSL will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

1. **Manage internally with help from external specialists where appropriate and possible.**

*Where the alleged behaviour between peers is abusive or violent (as opposed to inappropriate or problematic – unless as stated above), scenarios 2,3,or 4 should ordinarily apply. However, where support from local agencies is not available, the School may need to handle concerns or allegations internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).*

2. **Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of the child/children and their family.**

*These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, a specialist harmful sexual behaviour team, CAMHS and/or youth offending services.*

3. **Refer the child/children to children's social care for a section 17/47 statutory**

## **assessment.**

*Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's social care in the area where they/each child lives. There will normally be an initial review and assessment of the referral, in accordance with Bromley's assessment framework. As a matter of best practice, if an incident of child on child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.*

### **4. Report alleged criminal behaviour to the police.**

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

The School's safeguarding committee should regularly review behaviour incident logs which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

## **Safety Plan**

The School will always carry out a safety plan in respect of:

- any child who is alleged to have behaved in a way that is considered to be abusive or violent
- any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child or
- any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL.

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

Careful judgement and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might actually be harmful to another child. Consultation is recommended with children's social care if there is any doubt about this. Careful consideration should also be given to a range of factors, including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring.

Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks



to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them. (See Appendix A for more information on Safety Plans)

## 8. Information sharing, Data Protection and Record Keeping

When responding to concern(s) or allegation(s) of child on child abuse, the School will:

- always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals
- record the information that is necessary for the School and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved
- keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose
- be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in *Working Together to Safeguard Children* (July 2018) and the *HM Government advice on Information Sharing* (updated in July 2018).

## 9. Disciplinary action

The School will consider whether sanctions may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the School works in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/or children's social care, the School may still need to consider what is the most appropriate action to take to ensure positive behaviour management.

Sanctions may sometimes be appropriate, including to:

- (a) ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- (b) demonstrate to the child/children and others that child on child abuse can never be tolerated; and
- (c) ensure the safety and wellbeing of other child

Before deciding on appropriate action the School will always consider:

- (i) its duty to safeguard all children in its care from harm
- (ii) the underlying reasons for a child's behaviour
- (iii) any unmet needs, or harm or abuse suffered by the child
- (iv) the risk that the child may pose to other children; and the severity of the child on child abuse and the causes of it.

The School will, where appropriate, consider the potential benefit, as well as challenge, of using suspension or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this

policy may still be required. For example, action may still need to be taken by the School in relation to other students who have been involved with and/or affected by child on child abuse. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the School.

In the event of any managed move, consideration must be given to sharing information with the receiving school regarding the child-on-child abuse in order to allow best protection of children in the new school.

Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

## **10. On-going Proactive Work for a Whole-School Community Contextual Safeguarding Approach**

The School's response to concerns or allegations of child-on-child abuse should be part of on-going proactive work by the School to embed best practice and in taking a whole-school community Contextual Safeguarding approach (defined above) to such abuse. As such the School's response can become part of its wider prevention work.

This response may involve the School working with the local authority to undertake, for example, a Contextual Safeguarding school assessment which would fit into a systems approach to Contextual Safeguarding. The response could also include the School asking itself a series of questions about the context in which an incident of child on child abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment – such as:

- What protective factors and influences exist within the School (such as positive peer influences, examples where child on child abuse has been challenged, etc.) and how can the School bolster these?
- How (if at all) did the School's physical environment or the students' routes to and from the School contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision, or by working with local safeguarding partners to mitigate the risks to students' safety whilst travelling to and from the School?
- How (if at all) did the online environment contribute to the abuse, and how can the School address this going forwards, for example by strengthening the way in which the School encourages positive and safe use of the internet by students?
- Did wider gender norms, equality issues, and/or societal attitudes contribute to the abuse?
- What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forward?
- Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse, or to address any victim-blaming narratives from staff?
- How have similar cases been managed in the past and what effect has this had?
- Does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent child on child abuse, including by way of the School's PSHE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work,

respect, boundaries, consent, children's rights and critical thinking and/or avoiding victim-blaming narratives?

- Are there any lessons to be learnt about the way in which the School engages with parents to address child on child abuse issues?
- Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- Does this case highlight a need to work with certain children to build their confidence, and teach them how to identify and manage abusive behaviour?
- Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the School?

Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the School's leadership and the DSL. The School will, where possible and appropriate, work with Bromley and wider partners to deliver on this plan, possibly as part of a wider Contextual Safeguarding school assessment led by or with input from the local authority.

## APPENDIX A SAFETY PLAN

### Safety Plan Meeting

This may be helpful to develop the Safety Plan.

Where such a meeting is to be held, careful consideration will need to be given to whether the child presenting the alleged behaviour, and/or their parents should attend.

Where a child or parent does not attend, their wishes and feelings should still be sought in relation to any proposed safety plan in advance of the meeting by a professional – in the case of the child, with a designated trusted professional with whom he/she has a positive relationship.

A version of the plan which is appropriate for the child's age and level of understanding should be provided to the child and their parents.

Efforts should also be made to ensure that they understand what is proposed and to seek their agreement to the arrangements.

These steps will help to ensure that the safety plan is appropriately tailored to each child's needs and will enable the school to work with others in an effort to meet these needs in the longer-term.

### The Safety Plan

This should:

- be proportionate and not stigmatise the child/ children allegedly responsible for or affected by the behaviour,
- set out relevant background information – including an overview of the context, the specific concern(s) or allegation(s), any relevant detail about the relationships, and any power differentials between the child/children allegedly responsible for the behaviour, and any children affected by it, the frequency of the alleged behaviour and any changes in it over time. Details should also be shared of action taken regarding the alleged concern(s) or allegation(s), and any advice provided by children's social care, and/or local Children and Families Hub (or equivalent), and/or other relevant agencies in accordance with BSCP and/or the police, and/or any other professional(s) working with the child/children,
- set out any relevant information regarding the child/ children concerned. For example, any relevant medical information, any previous concerns about the child's/children's behaviour, needs or harm that the child/children may have been exposed to in the past. Information should be shared on their wishes and feelings regarding the proposed safety plan. Consideration may need to be given to having two or more separate but aligned safety plans for the child who is allegedly responsible for the behaviour, and the child or children affected by it,
- identify and assess the nature and level of risk that is posed and/or faced by the child/children in school such as that which may arise in relation to locations, activities, contact with particular students, or transport arrangements to and from school; and contexts outside the school, including at home, in relationships with friends, peer groups, interactions in the neighbourhood and/or during online activity,
- set out the steps and controls that can be put in place to reduce or manage any risk.

Issues that may be addressed include:

- how safety will be ensured in the classroom, out of the classroom, on transport, and during unstructured or extra-curricular activities, including trips and residential stays away from school. This may involve separating the child/ children who present risk from other children who may be affected by the alleged child on child abuse,
  - how to ensure that the child/children reportedly affected by the alleged behaviour feel(s) supported, including by appointing a trusted member of staff (a ‘critical friend’) with whom they can speak if they have existing concerns or if there are any future developments which cause them concern,
  - how best to draw on any other trusting relationships where these exist, and create them where they do not, to provide the children concerned with support and a sense of belonging,
  - where relevant, how to manage the child’s/ children’s behaviour – this can be done in a number of ways including, for example, by way of a de-escalation plan for staff which identifies any triggers, explains how their behaviour can escalate, sets out the function of the behaviour for the child /children, and proposes an appropriate action or response to it; identifying language that should be used and avoided; a positive handling plan; or implementing controls and measures to reduce or manage any risk,
  - whether restorative action would be appropriate and, if so, how best to take such action, bearing in mind the specific needs of the child/children concerned, and the appropriateness of any such action given the nature and seriousness of the concern(s) or allegation(s). Advice should be taken from children’s social care, specialist sexual violence services, and the police where they are involved (if so, proposed restorative action could otherwise jeopardise a police investigation),
  - whether any targeted interventions are needed to address the underlying attitudes or behaviour of the child/children, any emotional and behavioural disorders, developmental disorders, or learning difficulties, and/or to meet the child’s/ children’s psychological, emotional or physical needs; drawing on local statutory, private and/ or voluntary services as appropriate, and
  - whether the behaviour is of such high risk that suitable controls cannot be put in place within our school setting which would enable it to be adequately managed. In this case consideration will need to be given to alternative plans for the child/children presenting the alleged behaviour. The principle that any child who is reported to have experienced child on child abuse should not have restrictions or controls placed on them as a result of another child’s alleged behaviour should be given priority consideration.
- identify and consider how to build on strengths and positive aspects that the/each child possesses and/or is exposed to, such as those emanating from activities or lessons that the child enjoys and engages with; positive characteristics and skills that the child possesses; and/or trusting relationships with the child’s family, other students or staff,
  - assess any risks that are posed and/or faced by the wider school community (including all other pupils and, where appropriate, staff and parents) and identify any steps that the school can take to mitigate these risks. This may include:
    - consideration of how to support any pupils (and, where appropriate, staff and parents) who know about and/or may be affected by the alleged behaviour, and/or

who may be required to participate in any investigation(s) – where these pupils have their own standalone safety plan, they should cross refer to and be consistent (where appropriate) with one another, and

- consideration of work that can be undertaken with the wider staff or pupil population to help to protect children against child on child abuse in the future. Careful consideration will need to be given to managing confidentiality for children affected by the alleged behaviour or engaged themselves in any such behaviour.
- set out the steps needed to implement the safety plan, including how to communicate with and what information should be shared with relevant staff members – in the strictest confidence – so that they are able to implement the actions set out in the plan and safeguard the children concerned appropriately, and
- be reviewed at regular intervals, or if there is a change in perceived risks or circumstances. Reviews should be carried out in light of the children's ongoing needs to ensure that real progress is being made which benefits the children concerned.

If at any stage the risk increases, there is a further alleged incident, or any individual child's needs escalate, the DSL should contact children's social care, and/or local Children and Local Hubs (or equivalent), and/or other relevant agencies in accordance with the BSCP procedures, to determine the appropriate course of action.

In the event that any new information is disclosed at any time indicating a child may have been harmed, is at risk of harm, or is in immediate danger, the school should again follow local safeguarding procedures in line with *Keeping Children Safe in Education* (September 2022), and *Working Together to Safeguard Children* (July 2018), and make a new referral to children's social care and, if appropriate, report to the police.

Similarly any new information disclosed at any time regarding alleged rape, assault by penetration or sexual assault must always be shared with the police.

## **APPENDIX B - OTHER USEFUL RESOURCES**

### **Tender**

<http://tender.org.uk/>

Works with schools providing educational programmes for children and staff training, aimed at preventing domestic abuse and sexual violence and promoting healthy relationships based on equality and respect

### **Childnet**

[http://www.childnet.com/ufiles/Cyberbullying\\_guidance2.pdf](http://www.childnet.com/ufiles/Cyberbullying_guidance2.pdf)

Provides cyber bullying guidance

<https://www.childnet.com/resources/pshe-toolkit>

Provides guidance for children and their parents on the nuanced features of live streaming and the specific risks children can face

<https://www.thinkuknow.co.uk/professionals/resources/live-streaming/>

### **Digital Awareness UK**

<https://www.digitalawarenessuk.com/>

Provides digital awareness training to educators, parents and students and has produced video resources for students and parents, in collaboration with the Girls Day School Trust

**The NSPCC** – has produced a range of resources aimed at educating children, staff, and parents about peer-on-peer abuse. This includes (but is not limited to)

- PANTS (The Underwear Rule) resources for parents, and staff  
<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/underwear-rule/>
- Speak Out Stay Safe programme of assemblies and workshops which teaches children to speak out if they are worried  
<https://www.nspcc.org.uk/services-and-resources/working-with-schools/speak-out-stay-safe-service/>
- Share aware campaign  
<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/share-aware/>

### **The National Clinical Assessment and Treatment Service (NCATS)**

<https://www.nspcc.org.uk/services-and-resources/childrens-services/ncats/>

Offers assessment and treatment services to children and young people with harmful sexual behaviour, and consultation and training to professionals managing complex or high-risk harmful sexual behaviour cases

### **The Lucy Faithful Foundation (LFF)**

<https://www.stopitnow.org.uk/>



Stop It Now! UK and Ireland is a child abuse prevention campaign and helpline which is run by the LFF – supporting adults to play their part in prevention through providing sound information, educating members of the public, training those who work with children and families, and running a confidential and anonymous helpline (available for anyone with concerns about child sexual abuse)

[https://www.lucyfaithfull.org.uk/files/Inform\\_Young\\_People\\_Leaflet\\_2017.pdf](https://www.lucyfaithfull.org.uk/files/Inform_Young_People_Leaflet_2017.pdf)

LFF leaflet for professionals, parents and carers who have concerns about a young person's online sexual behaviour

[https://www.parentsprotect.co.uk/files/LFF\\_eResource\\_Pack\\_for\\_Parents\\_JUNE17.pdf](https://www.parentsprotect.co.uk/files/LFF_eResource_Pack_for_Parents_JUNE17.pdf)

LFF guidance *What's the problem? A guide for parents of children and young people who have got in trouble online*

<https://www.parentsprotect.co.uk/>

**Parents Protect** provides services to agencies working with children and their families – for those with problematic sexual behaviour on the internet and in the 'real world'. Parents Protect is a project of the LFF, and provides an online resource for parents, and others who want to protect children from harm

### **Red Balloon Learning Centres**

<http://www.redballoonlearner.org/>

Red Balloon supports children who self-exclude from school and are missing education because of bullying or other trauma. It provides an academic and therapeutic programme to enable its students to get back on track and reconnect with society

### **LeapConfronting Conflict**

<http://www.leapconfrontingconflict.org.uk/>

Leap is an award-winning national youth charity that provides inspirational conflict management programmes and support to children (and young adults) and the professionals working with them

### **Barnardo's**

[https://www.barnardos.org.uk/what\\_we\\_do/our\\_work/sexual\\_exploitation/cse-professionals/cse-can-you-see-it.htm](https://www.barnardos.org.uk/what_we_do/our_work/sexual_exploitation/cse-professionals/cse-can-you-see-it.htm)

### **Government Guidance**

**HM Government, What to do if you're worried a child is being abused, advice for practitioners, March 2015**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

**Department for Education, Preventing and Tackling Bullying: Advice for headteachers, staff and governing bodies, July 2017**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)



**Department for Education, Sexual Violence and Sexual Harassment Between Children in Schools and Colleges: Advice for Governing Bodies, Proprietors, Head Teachers, Principals, Senior Leadership Teams and Designated Safeguarding Leads, May 2018**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual violence and sexual harassment between children in schools and colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

**Department for Education, Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children, July 2018**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working Together to Safeguard Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)