

## CHILD PROTECTION AND SAFEGUARDING - CHILD ON CHILD ABUSE

Policy applies from EYFS to Sixth Form and to all Staff	
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Version	Date	Paragraph	Material change	Approval
09.22 v1	01.09.2022	7	New paragraphs inserted to provide detail re. Harmful Sexual Behaviour.	Mr Luke Goodman

12.22 v1	02.12.2022	4 and Appendix 2	New procedure for dealing sexual violence and sexual harassment allegations inserted in Appendix 2.	Mr Luke Goodman
09.23 v1	01.09.2023	N/a	No material changes.	Mr Chris Collins

**Clifton High School is committed to child protection and safeguarding children and young people and expects all staff, visitors and volunteers to share this commitment.**

### **Related Policies**

Acceptable use of ICT Agreement for pupils

Anti-Bullying

Behaviour Policy - Infant and Junior School/Senior School

Child Protection and Safeguarding

Online Safety

Pupil Code of Conduct - Infant and Junior School/Senior School

### **1. Introduction**

The Council of Governors, Senior Leadership Team, and All Staff and Volunteers at Clifton High 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, the School:

- believe that in order to protect children, all schools should (a) be aware of the nature and level of risk to which their students are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and (b) take a whole-school community Contextual Safeguarding approach to preventing and responding to child-on-child abuse;
- regard the introduction of this policy as a preventative measure. We (a) do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it;
- 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; and
- 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 other children, they should inform the School so that it can ensure that appropriate and prompt action is taken in response.

This policy:



- sets out our strategy for preventing, identifying and appropriately managing child-on-child abuse;
- applies to all Members of Governing Council, Senior Leadership Team, staff and volunteers, will be reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which pupils are or may be exposed;
- is the School's overarching policy for any issue that could constitute child-on-child abuse;
- relates to, and should be read alongside, the Schools' Child Protection and Safeguarding Policy and any other relevant policies including, but not limited to, the Anti Bullying policy (including cyber-bullying), ICT - Acceptable Use Agreement for pupils and Online Safety, Pupil Code of Conduct and Behaviour Policies;
- recognises that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up';
- is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education 2023;
- does not use the term 'victim' and/or 'perpetrator'. This is because Clifton High School takes a safeguarding approach to all individuals involved in allegations of or concerns about child-on-child abuse, including those who are alleged to have been abused and those who are alleged to have abused other children, in addition to any sanctioning that may also be required for the latter. We recognise 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 other children, parents or adults in the community prior to their abuse of other children;
- uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to child-on-child abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all pupils, regardless of age. Although the starting point is that Clifton High School's response to child-on-child abuse should be the same for all pupils, regardless of age, there may be some additional considerations in relation to a pupil aged 18 or over in terms of how local agencies and/or partners respond. This, for example, is likely to be different on the part of local authorities, given that their safeguarding duties are limited, in the case of children's social care services - save for a number of specific exceptions - to children under the age of 18. Similarly, the School's response to incidents involving the exchange of youth produced sexual imagery will need to differ depending on the age of the pupils involved. Refer to Online Safety policy. There is also likely to be a more significant criminal justice response in relation to any pupil responsible for abuse who is aged 18 or over; and
- is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education 2023 and is supported by the key principle of the Children's Act 1989, that the child's welfare is paramount. Another key document is Working



Together, 2018, highlighting that every assessment of a child ‘must be informed by the views of the child’ (Working Together, 2018:21). It should, if relevant according to the concerns/allegations raised, be read in conjunction with Keeping Children Safe in Education 2023 Part Five: Child-On-Child sexual violence and sexual harassment, and any other advice and guidance referred to within it, as appropriate.

This policy should be read in conjunction with the Local Safeguarding Partnership’s Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

## **2. Purpose of the policy**

Children and young people may be harmful to one another in a number of ways which would be classified as child-on-child abuse. It is necessary to consider:

- what abuse is and what it looks like;
- how it can be managed;
- what appropriate support and intervention can be put in place to meet the needs of the individual; and
- what preventative strategies may be put in place to reduce further risk of harm.

## **3. 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 associations with other children. (*Firmin, C. 2017. Abuse Between Young People: A Contextual Account. Oxon: Routledge*).

Child-on-child abuse can take various forms, including but not limited to: serious bullying (including cyber-bullying), relationship abuse (sometimes known as ‘teenage relationship abuse’), domestic 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. Refer to [Appendix 1](#) Figure 1.

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

## **4. Sexual Violence/Sexual Harassment**

Clifton High School has a zero-tolerance approach to sexual violence and sexual harassment. Any allegations of sexual violence and sexual harassment must always be referred immediately to the Designated Safeguarding Lead. The DSL and the Safeguarding team will follow the procedure set out in Appendix 2, and will also follow the DfE Guidance in Keeping



Children Safe in Education 2023 Part Five: Child-On-Child sexual violence and sexual harassment with consideration of:

- Options to Manage the Report, 1. Manage internally (paras 486 - 488);
- Options to Manage the Report, 2. Early Help (paras 489 - 495);
- Options to Manage the Report, 3. Referrals to local authority children's social care (paras 496 - 503); and
- Options to Manage the Report, 4. Reporting to the Police (paras 504 - 514).

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 intended 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 it is to the young person it is intended towards. Children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school.

Sexually harmful behaviour may include:

- inappropriate sexual language;
- inappropriate role play;
- sexual touching; and
- sexual violence and sexual harassment.

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 physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras, pulling down trousers and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and
- recognising, acknowledging, and understanding the scale of harassment and abuse, and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

Abuse rarely takes place in isolation and often indicates wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, sexual bullying



in schools and other settings can result in the sexual exploitation of children by other children. For 16 and 17 year olds who are in abusive relationships, what may appear to be a case of domestic violence may also involve sexual exploitation. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences.

This can be done by adopting a contextual safeguarding approach and by ensuring that our response to incidents of child-on-child abuse considers any potential complexity.

## **5. What is Contextual Safeguarding?**

This policy encapsulates a contextual safeguarding approach, which:

- is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts, acknowledges that safeguarding incidents and behaviours may be associated with factors outside of Clifton High School, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities;
- recognises that as children enter adolescence they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse, and seeks to understand the impact of these wider social contexts; Refer to Appendix 1 Figure 2;
- considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a tutor group, pastoral and Safeguarding Staff could work with the Phase Leader/Head of Year and pupil body to challenge a harmful or insensitive culture, thus improving the pre-existing school environment; and
- looks at the way professionals approach child protection when risks occur outside the family, thereby requiring all those within a local safeguarding partnership to consider how to work alongside, rather than just refer into, children's social care.

## **6. 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 schoolgirls 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].



## 7. When does behaviour become problematic or abusive?

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

### Sexual behaviours

As the NSPCC explains: “children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour... As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is **harmful sexual behaviours** or HSB.” This term has been adopted widely in the field, and is used throughout the NSPCC’s and Research in Practice's Harmful Sexual Behaviour Framework, as well as this policy. Please see pages 14 and 15 of NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework: <https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework>. The Brook Sexual Behaviours Traffic Light Tool (<https://www.brook.org.uk/our-work/category/sexualbehaviours-traffic-light-tool>) can be very helpful in identifying sexual behaviours by children. Staff should always use their professional judgment and discuss any concerns with the DSL.

Where an (alleged) incident involves a report of harmful sexual behaviour (HSB), relevant staff should also consult Keeping Children Safe in Education 2023 Part Five: Child-On-Child sexual violence and sexual harassment.

HSB can occur online and/or face-to-face. HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support. Refer to [Appendix 1](#) Figure 3.

### Other Behaviour

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

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

It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving youth produced sexual imagery may be inappropriate in one context, for example, when exchanged between two children in a consenting relationship, and abusive in another, for example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or (c) used to pressure the child into engaging in other sexual behaviours.

Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital, and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two children may not constitute child-on-child abuse where the fight is a one-off incident, but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership - including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual pupil basis, but could also apply across the pupil body.

Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which the School will need to take a whole-school approach in order to prevent



escalation. For example, where multiple boys are making inappropriate comments about girls, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise and/or revising Clifton High School's PSHE programme.

It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, the School will follow the procedures set out below.

#### **8. How can a child who is being abused by other children be identified?**

All staff should be alert to the wellbeing of pupils 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.

Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse (please see Appendix 1 of the Child Protection and Safeguarding Policy for indicators of abuse) and can include:

1. failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected;
2. physical injuries;
3. experiencing difficulties with mental health and/or emotional wellbeing;
4. becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;
5. broader changes in behaviour including alcohol or substance misuse;
6. changes in appearance and/or starting to act in a way that is not appropriate for the child's age; and/or
7. abusive behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any



underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by other children) and, if so, what the concern is and how the child can be supported going forwards.

The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of child-on-child abuse, a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

#### **9. Are some children particularly vulnerable to abusing or being abused by other children?**

Any child can be vulnerable to child-on-child abuse due to the strength of other children's 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 other children. 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 other children 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 other children, as may children with SEN.

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. (*Barter C, McCarry M, Berridge D and Evans K, "Partner exploitation and violence in teenage intimate relationships" (2009): <https://www.nspcc.org.uk/globalassets/documents/research-reports/partner-exploitation-violenceteenage-intimate-relationships-report.pdf>*)

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:



- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding - being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers. Any reports of abuse involving children with SEND will therefore require close liaison with the DSL or DDSLs and the SENCO.

Children who are lesbian, gay, bi, or trans (LGBT) - The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

## 10. A Whole School Approach

Clifton High School intends to actively raise awareness of and prevent all forms of child-on-child abuse, throughout its School Environment by:

- Educating all Council Members, Senior Leadership Team, staff and volunteers, pupils and parents about this issue. This includes:
  - training all Council Members, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes:
    - (a) contextual safeguarding;

- (b) the identification and classification of specific behaviours; and
  - (c) 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;
- educating children about the nature and prevalence of child-on-child abuse via Life Skills and the wider curriculum, for example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Pupils are 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 informed about the School's approach to such issues, including its **zero-tolerance** policy towards all forms of child-on-child abuse; and
- engaging parents on this issue by:
  - (a) talking about it with parents, both in groups and one to one;
  - (b) asking parents what they perceive to be the risks facing their child and how they would like to see the School address those risks;
- ensuring that all child-on-child abuse issues are fed back to the DSL and the School's Safeguarding Team so that they can spot and address any concerning trends and identify pupils who may need additional support. This is done through regular pastoral meetings, including formal 1:1 Head of Year line manager meetings, at which all concerns about pupils (including child-on-child abuse issues) are discussed, and through the CPOMS recording system;
- challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- working with Members of the Council of Governors, Senior Leadership Team, All Staff and Volunteers, 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;
- creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to; and
- responding to cases of child-on-child abuse promptly and appropriately.

## 11. Multi-agency Working



The School actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, Bristol Keeping Children Safe Partnership (<https://bristolsafeguarding.org/children>), and Bristol Safeguarding in Education Team (<https://www.bristolsafeguardingineducation.org/>) and the police and/or other relevant agencies (in accordance with the Local Safeguarding Partnership's procedures) and other schools. The School will actively refer concerns/allegations of child-on-child abuse to children's social care or other relevant agencies, where necessary.

## **12. Responding to concerns or allegations of child-on-child abuse**

It is essential that all concerns/allegations of child-on-child abuse are handled sensitively, proportionately, appropriately and promptly. The way in which they are responded to can have a significant impact on the school environment. Any response will be co-ordinated by the DSL (or in their absence the DDSL / DSLs) and 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; and
- 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.

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

The school should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school or college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purposes is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the DSL or DDSL, who should consider the following:



- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the DSL or DDSL will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Additional information on confidentiality and information sharing is available at [Safeguarding Practitioners Information Sharing Advice](#) and [NSPCC: Information sharing and confidentiality for practitioners](#).

Any response could also 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 socio-cultural 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's/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; and
- 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.



**13. What should you do if you suspect either that a child may be at risk of or experiencing abuse by other children, or that a child may be at risk of abusing or may be abusing other children?**

If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care (if the pupil is aged under 18) and/or the police should be 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 Pages 9-14 of the Child Protection and Safeguarding Policy).

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

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 procedure set out in the Child Protection and Safeguarding Policy.

**14. How will the School respond to concerns or allegations of child-on-child abuse?**

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. DSLs should always use their professional judgement to determine whether it is appropriate for 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 any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact Bristol First Response immediately, and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the allegations/concerns with the Community Social Worker/Family Front Door (or as otherwise in accordance with Bristol Keeping Children Safe Partnership procedures) and agree on a course of action, which may include:

**A - Manage internally with help from external specialists where appropriate and possible.** Where behaviour between children is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinary apply. However, where support from local external agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from relevant specialists (either in the private and/or voluntary sector), as appropriate. These might include psychologists, psychotherapists, counsellors etc.

**B - Undertake/contribute to an inter-agency early help assessment** , with targeted early help services provided to address the assessed needs of a child/children and their family. These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.

**C - Refer child/children to children's social care for a section 17 and/or 47 statutory assessment. The referral will be made to children's social care in the area where each child involved lives.** 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 child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

**D - 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 produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

#### **15. Individual risk assessment**

Where there is an incident of child-on-child abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse. These risk assessments will:

- assess and address the nature and level of risks that are posed and/or faced by the child;
- engage, where appropriate, the child's parents and where appropriate, draw upon local services and agencies to ensure that the child's needs are met in the long-term. Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child; and
- be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

If at any stage the child's needs escalate, the DSL should contact Bristol Safeguarding Partnership and act in accordance with the local safeguarding and child protection procedures, to determine the appropriate course of action.

#### **16. 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; and
- be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in *Working Together to Safeguard Children* (July 2018) and the *HM Government advice on Information Sharing* (updated in July 2018).

### 17. Disciplinary action

The School may wish to consider whether disciplinary action 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. Disciplinary action 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 children.

However, these considerations must be balanced against any police investigations, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns. Before deciding on appropriate action the School will always consider its duty to safeguard all children in its care from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; 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 managed moves or exclusion as a response, and not as an intervention, recognizing 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. Engaging in Fair Access Panel Processes to assist with decision-making associated to managed moves and exclusions can also be beneficial.<sup>76</sup> 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.

### **18. On-going proactive work to a whole-school 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 SLT, including the DSL.

## 19. Resources

### Topical Safeguarding information from Bristol Safeguarding in Education Team:

- **Anti-bullying practice:** [Anti-Bullying Alliance's 3 step Response to Bullying Framework](#) - Guidance to help educators develop a consistent, reflective and more effective approach to responding to bullying incidence in schools and other settings.
- [Preventing and tackling bullying \(2013; Updated 2017\)](#) - Guidance for schools on preventing and responding to bullying.
- The [Anti-Bullying Alliance](#) website holds a lot of free resources for education settings. Bristol is an All Together Local Authority

### Sexual Violence and Sexual harassment:

- Keeping Children Safe in Education 2023 Part Five: Child-On-Child sexual violence and sexual harassment.
- [Sexting in schools and colleges \(2016\)](#) - Guidance for schools and colleges on responding in instances of 'sexting'.

### Local Guidance:



- Be Safe is a multi-agency partnership service working with children and young people with problematic/harmful sexual behaviour in Bristol. Be Safe offers holistic assessment and therapeutic intervention services informed by strength based, systemic, cognitive behavioural therapy, resolutions, relapse prevention and attachment based approaches. [Click here to visit their website.](#)

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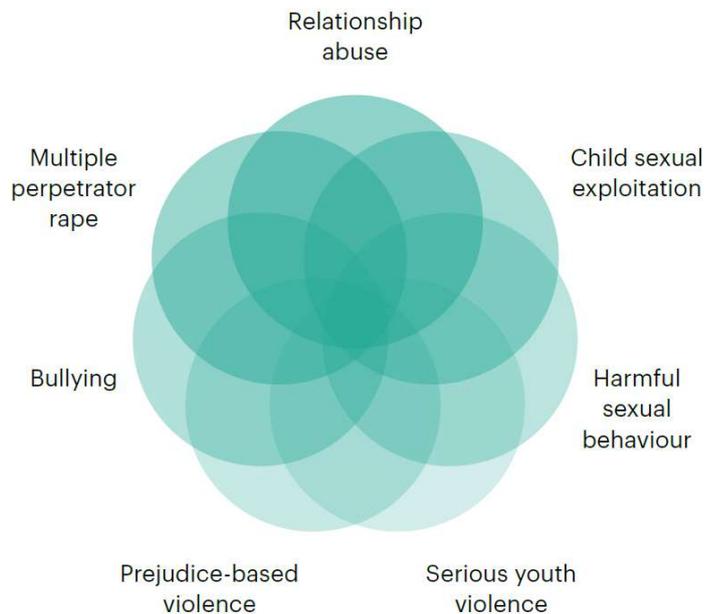
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Appendix 1

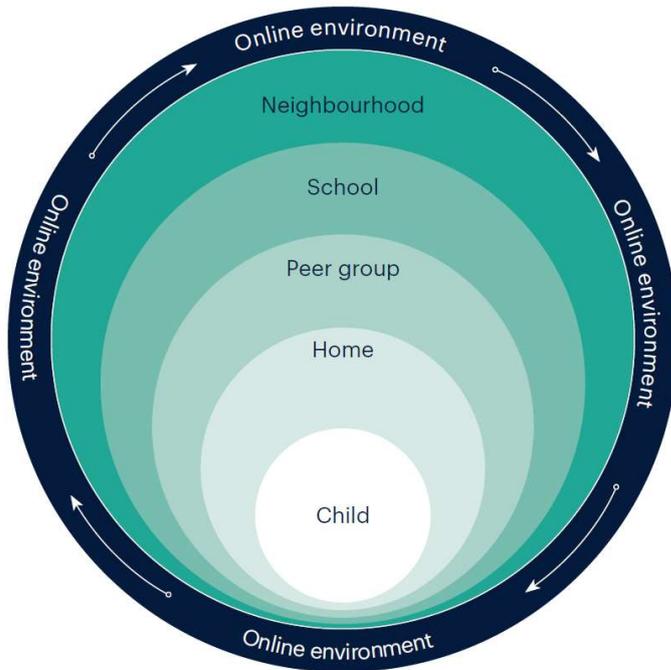
Fig.1 - Holistic account of child-on-child abuse:



This diagram was developed from Firmin's holistic account of child-on-child abuse: Firmin C., and Curtis G., Ms Understood Partnership, *Practitioner Briefing #1: What is peer-on-peer abuse?* (2015):

<http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB01.pdf>

Fig.2 - Contextual circles of adolescent vulnerability



*This diagram is drawn from Firmin's Contextual Circles of Adolescent Vulnerability. Firmin, C., Abuse Between Young People: A Contextual Account, 2017. Oxon: Routledge*

**Fig.3 – Sexual behaviours continuum model**

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

Brook, *Sexual Behaviours Traffic Light Tool*: <https://www.brook.org.uk/our-work/the-sexual-behaviourstraffic-light-tool> and please also see the NSPCC's, *Research in Practice's* and Professor Simon Hackett's *harmful sexual behaviour framework, 2019, page 28*: <https://learning.nspcc.org.uk/researchresources/2019/harmful-sexual-behaviour-framework/>



**Appendix 2 – Procedure to follow when sexual violence or harassment is reported**

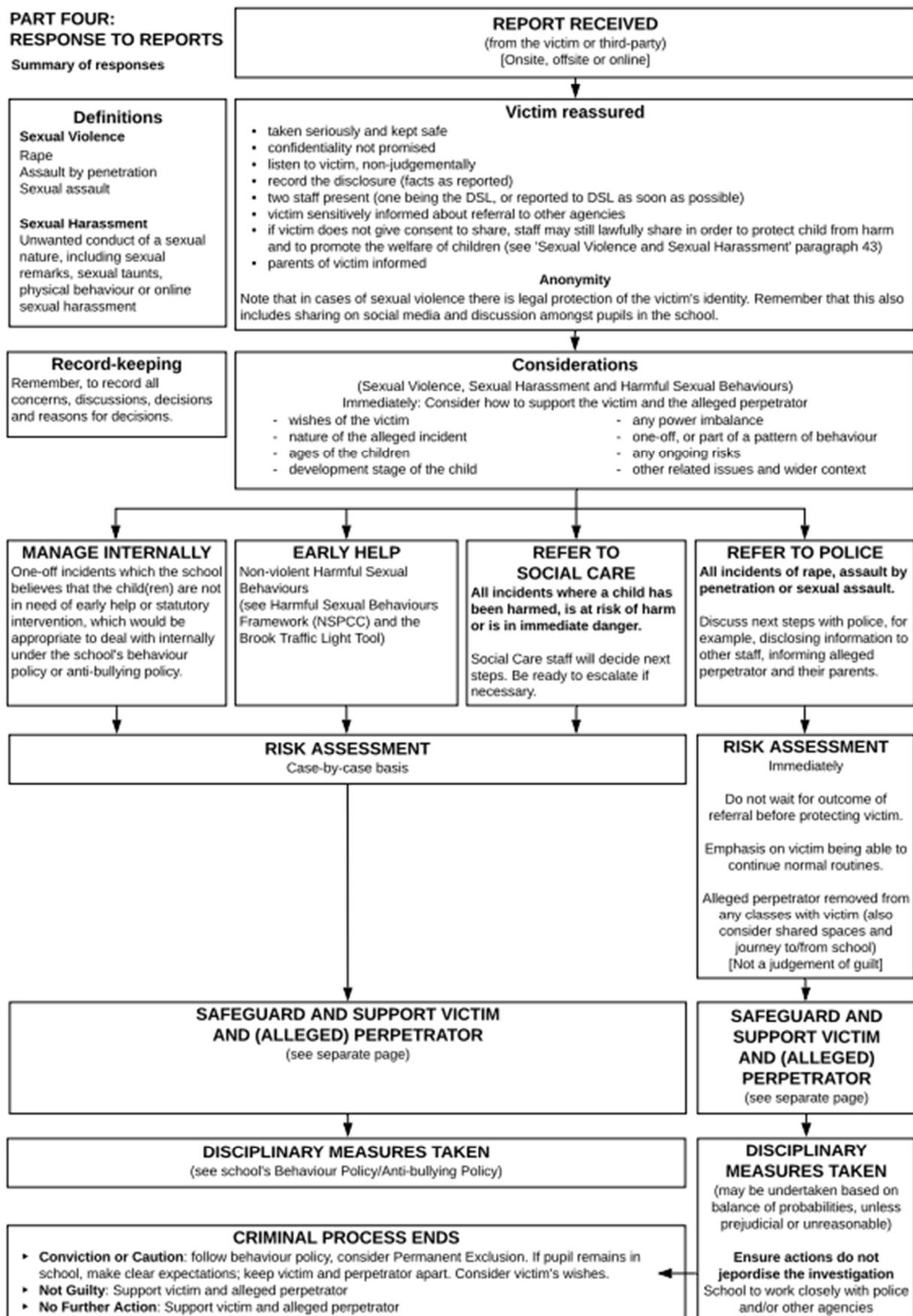
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**PART FOUR:  
RESPONSE TO REPORTS**  
Summary of responses





### Appendix 3 – Further Resources - Educating staff, children, and parents

**Disrespect Nobody Home Office Campaign** - <https://www.disrespectnobody.co.uk/>

**Serious Youth Violence – Home Office ‘This is abuse campaign for schools’** - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/410010/2015-03-08\\_This\\_is\\_Abuse\\_campaign\\_summary\\_report\\_2\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/410010/2015-03-08_This_is_Abuse_campaign_summary_report_2_.pdf)

<http://www.childnet.com/ufiles/Cyberbullyingguidance2.pdf>

**Fritz, D. and Firmin, C., 2016 Learning Project 1: Evidencing peer-on-peer abuse in educational Settings** <https://contextualsafeguarding.org.uk/assets/documents/Learning-Project-1-Briefing.pdf>

**AVA Prevention Platform** - <http://www.preventionplatform.co.uk/>

*Has produced guidance for schools on how to develop students’ understanding and skills to prevent violence against women and girls (VAWG)*

**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/Cyberbullyingguidance2.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 child-on-child 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/>



# Clifton High School

Share aware campaign <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/share-aware/>

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