CHILD ON
CHILD ABUSE POLICY

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The school's responsibilities

Introduction

The governors, senior leadership team, and all staff (which term shall apply to all volunteer staff members) at Hollinswood Primary School & Nursery 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:

- Believe that in order to protect children, our school 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;

(b) Take a whole-school community Contextual Safeguarding approach to preventing and responding to child-on-child abuse.

(c) Understand that safeguarding is everyone's responsibility and adopt a 'it does happen here' rather than 'it could happen here' approach.

- 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; and (b) believe that in order to tackle child-on-child abuse proactively, it is necessary to focus on all four of the following areas: (i) systems and structures; (ii) prevention; (iii) identification; and (iv) response/ intervention,
- 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 parent to work with us 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 in response.

This policy:

- Is the school's overarching policy for any issue that could constitute child-on-child abuse. It relates to, and should be read alongside, the school's child protection 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.

- Sets out our strategy for improving prevention, identifying and appropriately managing child-on-child abuse.
- Applies to all governors, the senior leadership team, and staff and is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed.
- 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 peer- on-peer abuse as set out in Keeping Children Safe in Education (September 2023),
- Does not use the term 'victim' and/or 'perpetrator'. This is because our school takes 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. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers.
- Uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18.
- 'Boy(s),' 'girl(s)' means a child/children whose biological sex is male and female respectively, as well as trans boys and trans girls, whose gender identity will be different from their biological sex. It is acknowledged that there will also be some children who identify as non-binary or gender fluid and who will not recognise the term boy or girl in respect to themselves.
- Should, if relevant, according to the concern(s) or allegation(s) raised, be read in conjunction with the DfE's advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (September 2021), and any other advice and guidance referred to within it, as appropriate, and
- Should be read in conjunction with the Local Safeguarding Partnership's Safeguarding Policy and Procedures, and any relevant Practice Guidance issued by it.

Understanding child-on-child abuse.

What is child-on-child abuse?

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

- **Bullying** – including cyberbullying, prejudice-based and discriminatory (including misogyny/misandry) bullying.
- **Hate incidents and hate crimes** – which may also include an online element.
- **Abuse in intimate personal relationships** between children (sometimes known as 'teenage relationship abuse') – which may also include an online element.
- **Physical abuse** – such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. This may include an online element which facilitates, threatens and/or encourages physical abuse.
- **Racism** – occurs when a person is treated less favourably because of their skin colour, nationality, ethnicity, or cultural group. Racist behaviour can include verbal abuse, physical attacks, exclusion from activities or opportunities and microaggressions, which can be conscious and unconscious. It can occur in person or online.
- **Initiation/hazing type violence and rituals** – this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- **Harmful sexual behaviour (HSB)** – is developmentally inappropriate sexual behaviour which is displayed by children and young people which is harmful or abusive.HSB can occur online and/or face to face, and can also occur simultaneously between the two – and includes, for example:
    - **Sexual violence** – such as:
        - Rape
        - Assault by penetration
        - Sexual assault
        - Causing someone to engage in sexual activity without consent – such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
        - Threatening the above behaviour, whether in person or by digital communications
    - **Sexual harassment** – which is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college – can include (but is not limited to):
        - Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone

sexualised names, intrusive questions about a person's sex life, and spreading sexual rumours
    - Sexual "jokes" or taunting
    - Suggestive looks, staring or leering
    - Sexual gestures
    - Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence. It is important to talk to and consider the experience of the victim)
    - Displaying pictures, photos or drawings of a sexual nature – upskirting which is a criminal offence, involving taking a picture or film under a person's clothing without their permission, with the intention of viewing their underwear, genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm, and
- **online sexual harassment** – this may be stand-alone or part of a wider pattern of sexual violence and/or harassment. It may include:
    - Non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
    - Sharing of unwanted explicit content
    - Revenge pornography, which is a criminal offence
    - Sexualised online bullying
    - Unwanted sexual comments and messages, including on social media
    - Sexual exploitation, coercion and threats, and
    - Coercing others into sharing images of themselves or performing acts they are not comfortable with online.
- **Misogyny** – commonly defined as dislike of, contempt for, or ingrained prejudice against girls and women. Schools and colleges have reported a rise in the number of incidents involving misogynistic language and behaviour, including incidents of sexual harassment even among very young students. Allowing such rhetoric and behaviour to persist can lead to the acceptance or normalisation of bullying, sexual violence and sexual harassment towards girls and women, and to harmful victim-blaming narratives. Misogynistic rhetoric is also commonly connected to extreme machoism or harmful ideas about masculinity which can impose damaging and unrealistic expectations and pressures on male students. There are concerns about such content being promoted or endorsed online, for example, by online influencers using TikTok or other social media platforms. The PSHE Association has commented that "The entry point for young people's first engagement with such content can often seem quite superficial, but social media algorithms can then lead them to increasingly problematic and extreme content. This all comes at an age

when young people may be particularly insecure and vulnerable to persuasive narratives. For example, much of this content taps into insecurities about body image and agency. The focus on money, success and power also plays on financial and status insecurities that may lead to risky and even illegal behaviours."

  - **Misandry** – commonly defined as dislike of, contempt for, or ingrained prejudice against boys and men.

- **Child exploitation**:
  - Child sexual exploitation (CSE) – including in the context of abusive relationships, and/or gang activity, and/or county lines – including in the context of modern slavery and human trafficking; and/or
  - Child criminal exploitation (CCE) – including in the context of abusive relationships, and/or youth or serious youth violence, and/or gang activity, and/ or county lines – including in the context of modern slavery and human trafficking.
  - Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. › CSE and CCE do not always involve physical contact; CSE and CCE can also occur through the use of technology.
- **Online child-on-child abuse** is any form of child-on-child abuse where an element might be facilitated by digital technology, for example, consensual and non-consensual sharing of nude and semi-nude images and/ or videos (sometimes called 'sexting'), online abuse, coercion and exploitation, child-on child grooming, misogyny/misandry, threatening and hate speech delivered via online means, the distribution of sexualised content (which might be youth-produced, commercial pornography or pseudo sexual images), and harassment. It is critical to be aware of the role that inequality and discrimination can play in child-on-child abuse. Socio-economic inequality within a school or college can increase bullying, and racial and ethnic minority status can be a risk factor for victimisation by peers. Children from minoritised groups are at much higher risk for poor health and behavioural outcomes as a result of discriminatory bullying. LGBTQ children may also be at greater risk of abusive behaviour from their peers.

What is Contextual Safeguarding?

This policy encapsulates a Contextual Safeguarding approach, which 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.

Through adopting a whole-school community Contextual Safeguarding approach, we:

- Are aware of and seek to understand the impact that these wider social contexts may be having on the school's students,
- Create 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,
- Are alert to and monitor changes in students' behaviour and/or attendance, and
- Contribute 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').

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, 25% of over 13,000 12- to 18-year-olds reported having been bullied in the last 12 month, which has increased by 25% from 2019. One in five 10- to 15-year-olds experienced at least one type of online bullying behaviour.

Are some children particularly vulnerable to abusing or being abused by other children?

Any child can be vulnerable to child-on-child abuse – including 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 some groups of chidlren are more vulnerable to child-on-child abuse:

- Children who are more likely to follow others and/or who are socially isolated from their peers
- Children who are exploring their sexuality or gender identity
- Children with 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.
- Children and young people with mental health difficulties
- LGBTQ children
- 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,
- Some children may be more likely to experience child-on-child abuse than others because of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

What is intersectionality?

Intersectionality is the recognition that people's experiences are shaped by their multi-layered identities. A person's interactions with the world are shaped by their ethnicity, age, gender, sexuality, class and abilities, and these aspects of a person's identity interrelate. Someone may experience racism, sexism and ageism collectively

or individually at different times and in different environments. The effect of his experiences may influence whether he is comfortable accessing support if he is a victim of child-on-child abuse.

One aspect of intersectionality that is particularly relevant to managing child-on-child abuse is adultification. This is a form of racial prejudice in which children from minoritised groups are treated as more mature than they actually are by a reasonable social standard of development. This may lead to failure to recognise victims of child-on-child abuse and to respond appropriately to the experiences of children from minoritised ethnic groups. Whilst adultification can impact all children in certain ways it is important that there is an acknowledgement that it specifically affects Black children.

Preventing child-on-child abuse.

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.

All staff should:

- Be aware of and understand the Safeguarding policy and Behaviour policy
- Know what to do if a child tells them they are being abused or exploited
- Recognise that children are capable of abusing other children (including online)
- Be able to reassure children who report child-on-child abuse that they are taken seriously and that they will be supported and kept safe
- Know that children may not feel ready to tell someone that they are being abused or exploited and or recognise their experiences as harmful.

Zero tolerance

School adopts a zero-tolerance approach to child-on-child abuse and will:

- Never do nothing in response to knowledge of child-on-child abuse and will always support those who report, and will proactively promote equality and non-discrimination
- Always take all allegations seriously.
- Take a proportionate and appropriate response to every alleged incident.
- Never take the approach that children are ‘just having a laugh’ or ‘boys being boys’ or ‘banter’.

Multi-agency working

The school actively engages with its Local Safeguarding Partnership in relation to child-on-child abuse, and works closely with, for example, children's social care, the police, and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures], and other schools.

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:

- Develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist;
- Ensure that its students are able to access the range of services and support they need quickly;
- Support and help inform the school's local community's response to child-on-child abuse;
- Increase the school's awareness and understanding of any concerning trends and emerging risks in its local area to enable it to take preventative action to minimise the risk of these being experienced by its students.

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

Proactive risk assessment

The school's safeguarding team will meet regularly to review behaviour incident logs and identify any changes in behaviour or concerning patterns or trends at an early stage. Regular proactive assessments will take place to determine the risks to which children are or may be exposed, as well as any protective factors which may exist, and monitor those risks and protective factors.

Risk assessments will consider:

- The nature and level of risk of the different variants of child-on-child abuse within the school;
- The makeup of pupils, including specific characteristics that might affect their vulnerability to child-on-child abuse such as, for example, gender, age, learning difficulties, special educational needs and/or disabilities, sexual orientation, ethnicity and/or religious belief;
- The fact that children may not always understand that they have experienced or carried out child-on-child abuse, for example, because they do not know what constitutes inappropriate sexualised behaviour, they have experienced sexual abuse and do not realise that what happened to them was wrong, they do not know whether consent was given, they are younger and therefore lack knowledge of sex/sexuality as they are less likely to have received sex or relationships education, or the abuse happened between friends or partners;
- Which of these children are affected, or are more at risk of being affected, by child-on-child abuse;
- Any trends;
- The various sociocultural contexts to which those students are associated including, for example, their peer group (both within and outside the school or college), family, the school environment, their experience(s) of crime and/or victimisation in the local community, and their online identities – which may impact on their behaviour and engagement in school or college;
- The barriers within the school environment that may affect ability to respond to child-on-child abuse – ie systems and structures, prevention, identification, response and intervention, and culture context.

The risk assessment is a proactive assessment of the general risks facing children at school and is not a reactive response. It will inform the safeguarding policy and will challenge and test any safeguarding procedures already in place. Action plans will be put into place to address any identified risks and these will be reviewed regularly.

A whole school approach.

School environment

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

- Educating all governors, its senior leadership team, staff, students, and parents about this issue. This includes training all governors, the senior leadership team, and staff on the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify, and respond to it. This includes:

- Contextual Safeguarding
- The identification and classification of specific behaviours, including digital behaviours
- The importance of taking seriously all forms of child-on-child abuse (no matter how 'low level' they may appear)
- Ensuring that no form of peer-on peer abuse is ever dismissed as horseplay or teasing
- Social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.

- Educating children about the nature and prevalence of child-on-child abuse, positive, responsible, and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider curriculum. Children are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse as follows:

  Educating children about consent includes teaching them basic facts such as:
  - A child under the age of 13 can never consent to any sexual activity.
  - The age of consent is 16.
  - 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,
  - Involving parents in the review of School policies and lesson plans, and
  - 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 counselling and therapy to address underlying mental health needs. These interventions can be 'de-clinicised' and brokered through a positive relationship with the school and its staff. All staff are trained to meet low-level mental health difficulties within the students.
  - Working with governors, senior leadership team, and all staff, students, 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 students can aspire to, and realise, safe and healthy relationships fostering a whole-school culture:
    - Which is founded on the idea that every member of our school community is responsible for building and maintaining safe and positive relationships, and helping to create a safe School environment in which violence and abuse are never acceptable, and in which certain behaviour such as the carrying of weapons is not tolerated],
    - In which children are able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts,
    - In which children feel able to share their concerns openly, in a non-judgmental environment, and have them listened to,
    - Which (i) proactively identifies positive qualities in students; (ii) nurtures these qualities; (iii) teaches and encourages students to think about positive hopes for the future; and (vi) supports students in developing small-scale goals that enable realistic ambitions, and
    - Which provides supervised activities to students that give them the experience of having their needs met that might otherwise apparently be met in abusive circumstances. These can include experiencing (i) status; (ii) excitement; and (iii) a degree of risk,
- Responding to cases of child-on-child abuse promptly and appropriately, and
- 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 need additional support; challenging the attitudes that underlie such abuse (both inside and outside the classroom).

The internet and social media

The internet can provide students with extraordinary positive opportunities, including for learning, sharing information and developing key skills, but it can also facilitate harm. Children will be given opportunities to develop their understanding about social media from an early age. This can be done gradually by, for example, weaving age-appropriate discussions into the curriculum, and encouraging safe and positive use of social media. Discussions should:

- Reinforce (as appropriate) that most social media platforms require users to be at least 13 years of age before they sign up (and some sites have raised this age limit to 16),
- Explain these age limits (as appropriate) to children, the reasons for them, and the consequences of breaching them. The Data Protection Act 2018 states that

children who are aged 13 years or older are capable of giving consent for data collection online.
- Celebrate difference. Not all children want to be on social media and children should never feel pressured into making choices that are not right for them;
- Always encourage children to share any concerns they may have from using the online environment, including social media – even if they are accessing a site that they should not and, where possible, provide reassurance to them that they will not be punished for doing so
- Provide children with advice on how to (i) share their concerns with staff, (ii) report inappropriate or harmful online content or contact to a platform provider or an independent agency, and (iii) seek support and advice if they are worried, from the school. Children should know that they will not get into trouble for disclosing a concern.

Identifying and assessing behaviour.

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. Rather than checking behaviour against a list, staff should be trained to be alert to behaviour that might cause concerns, to use their professional curiosity and think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour and engage with parents so that the cause of behaviour can be investigated.

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.

Sexual behaviours

In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals to statutory services are not required, and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.

Other behaviour

- When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can consider 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
- Involves a misuse of power.

How can a child who is being abused by their peers be identified?

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) because of their

experiences will differ. Incidences of child-on-child abuse will be recorded on our electronic system, CPOMS.

Responding to concerns or allegations of child-on-child abuse.

General principles

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, consider:
  - 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, and
  - 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 consider 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.

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

Where an incident, or a report of an incident by a first or third party occurs between children, whether in or out of school or online, all staff should refer to the child-on-child abuse actions flowchart (Appendix 2). In all cases, we will follow a stepped approach:

1. Report received
2. Victim reassured
3. Considerations - manage internally/Early Help/Refer to social care/refer to Police.
4. Risk assessment
5. Safeguard and support victim and (alleged) perpetrator.
6. Disciplinary measures taken.
7. Criminal process ends (if appropriate).

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 a senior member of staff or a DSL without delay 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.

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 the child protection policy.

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

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. DSLs should always use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (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 and /or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures on a no-names basis (where possible) to determine the most appropriate response.

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

- 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), referrals to social care or the police will 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).
- 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.
- 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 the/each child lives.

Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment of the referral, in accordance with that area's assessment framework.

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.

- 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 involved sexual imagery does not involve any aggravating factors [see the school's youth involved sexual imagery policy for further information].The police will only take a welfare rather than an enforcement approach towards children aged under 10, which is the age of criminal responsibility in England and Wales.

  All concerns or allegations will be assessed on a case-by-case basis, and in light of the wider context.

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
- Maintaining and monitoring behaviour incident logs provides one route to a summary assessment of any behavioural trends that may be emerging across

a cohort of children, at a particular time of day or in a specific location. It is important that the language used to describe alleged behaviour is clear and avoids using euphemisms which can prevent potential patterns from being identified.

Where appropriate, the views of the children should be sought. These views should be taken into account and properly balanced against the school's duty to safeguard and protect any child/ren affected by the alleged incident. Where a decision is taken to share information with local authority children's social care and/or the police and/or any other relevant agency against the wishes of a child, this needs to be handled extremely carefully, the reason(s) explained to them, and appropriate professional support offered; the school or college may wish to seek legal advice on how best to handle the situation.

It is essential that written records of concerns or allegations of child-on-child abuse are made.

These should:

- Be contemporaneous (existing, occurring, or originating during the same time);
- Be comprehensive and accurate;
- Clearly and explicitly describe the nature of the alleged behaviour without using euphemisms, and contain the exact words that have been said, irrespective of the vulgarity or impropriety of the language;
- Use names and not initials;
- Note where the incident occurred and whether anyone else was around;
- Distinguish between fact and opinion;
- Contain adequate information for the purpose;
- Include details of how the concern/allegation was followed up and resolved;
- Include a note of any action taken, decisions reached and the outcome.

As part of meeting a child's needs, it is important that the importance of information sharing between practitioners and local agencies is recognised. Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and wellbeing of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Working Together to Safeguard Children, July 2018 (WTSC 2018) sets out to correct common myths about the laws of privacy, data protection and confidentiality; fears that can hamper effective keeping and sharing of records. The bottom line is that, if there are legitimate safeguarding concerns about a child, then data protection law

will allow schools to record, share and retain even the most sensitive personal data as necessary to support their policies (even when it is not feasible to obtain consent).

Safety plans (risk assessments).

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 judgment – 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 judgment 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 (which are outlined in Appendix 3) 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.

A safety plan (risk assessment) should:

- Be as clear and user friendly as possible.
- Be proportionate, and not stigmatise or shame the (as relevant to each particular case) alleged perpetrator(s), or victim(s), or other child/children who may be affected by the alleged behaviour.
- Set out all 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 children concerned;
- 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 local authority children's social care, the police, and/or other relevant agencies in accordance with safeguarding arrangements, and/or any other practitioner(s) working with the child/ children concerned.

- Set out any relevant information regarding the child/children concerned. For example:
  - Any relevant medical information;
  - Any impact on their academic performance or social life (views of the parents or teachers may be helpful);
  - Any previous concerns about their behaviour, needs or harm that they may have been exposed to in the past.

Information should be shared on their wishes and feelings regarding the proposed risk assessment.

- Identify and assess the nature and level of risk that is posed and/or faced by the child/ children concerned:
  a) In school– such as that which may arise in relation to locations, activities, contact with particular children and influential peer groups, or transport arrangements to and from school;
  b) Contexts outside the school– including at home, in relationships with friends, peer groups, interactions in the neighbourhood and/or during online activity.

In order to give children a sense of freedom and opportunity to develop, spaces where no extra supervision is required should be promoted as far as is safe to do so.

- Set out the steps and controls that can be put in place to reduce or manage any risk – to avoid, so far as possible, the child/children concerned missing out on beneficial activities. Issues that may be addressed include:
  - How safety will be ensured in and outside the classroom, on transport, and during unstructured or extra-curricular activities – including trips and residential stays away from school.
  - How to ensure that any child/children who may be 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 child/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 the local authority children's social care, sexual violence specialists, and the police, where they are involved (to avoid proposed restorative action potentially jeopardising any 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 the school setting which would enable it to be adequately managed.

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.
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. 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.

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.

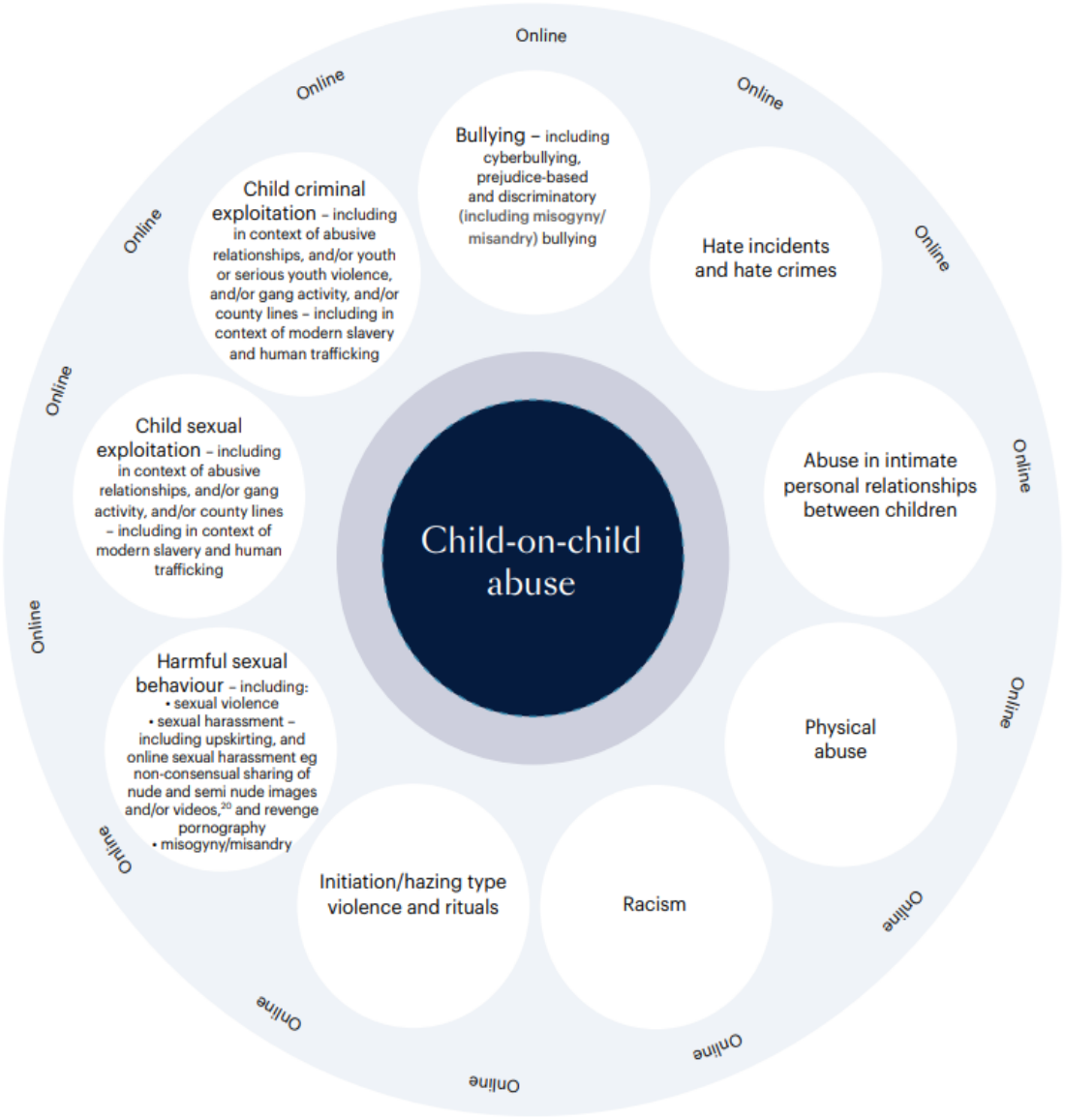
The response could also include the School asking itself a series of questions about the context in which an incident of child-on-child abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment – such as:

- 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?

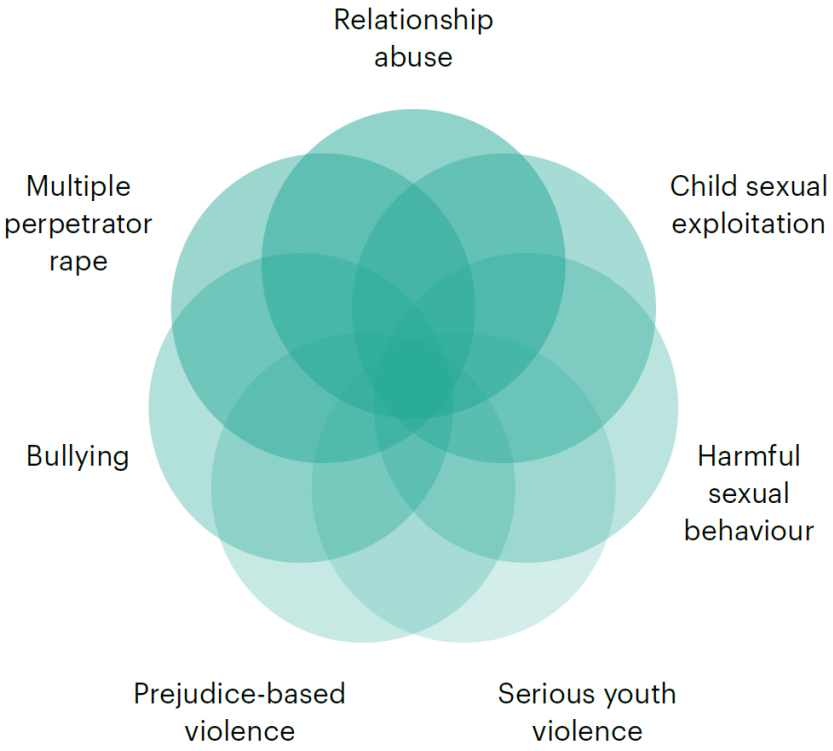
Answers to these questions can be developed into an action plan that is reviewed on a regular basis by the school's leadership and the DSL. The school will, where possible and appropriate, work with the local authority and wider partners to deliver on this plan, possibly as part of a wider Contextual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

Appendix 1

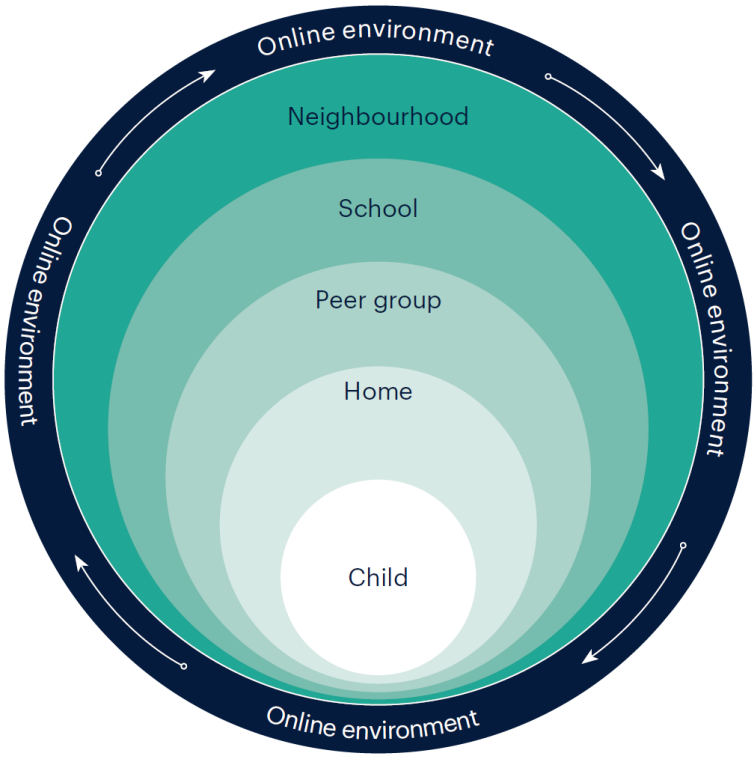
Overview of child-on-child abuse



Holistic account of child-on-child abuse

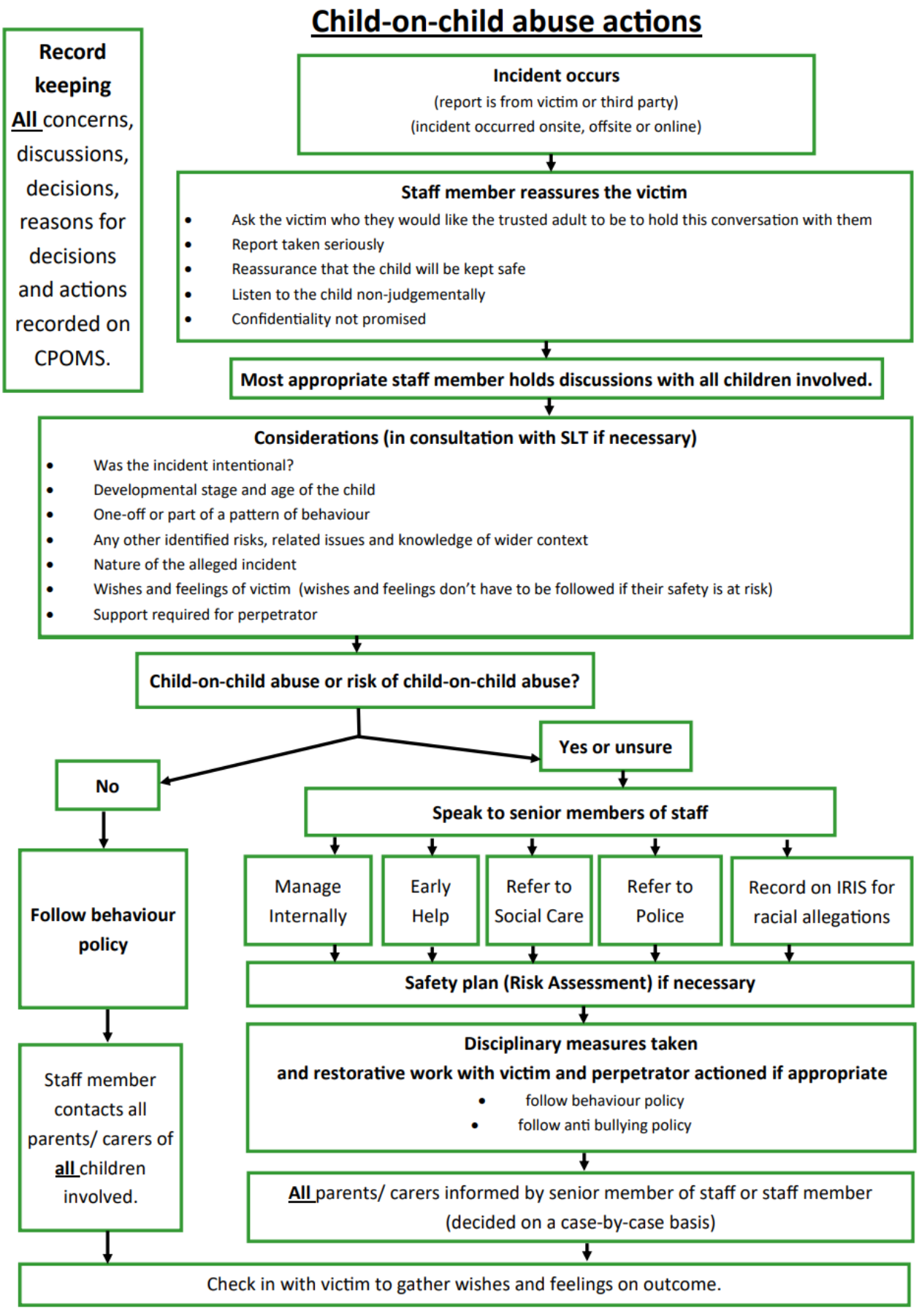


Contextual circles of adolescent vulnerability



Appendix 2

Flow chart



Appendix 3

Telford & Wrekin COUNCIL	Risk assessment of: **Child-on-Child Abuse**	Business Unit/ School:**Hollinswood Primary School & Nursery**	Risk Assessment Number:	Carried out by: **Emma Morris (Deputy Head)**
Date: **September 2023**	Review date: **September 2024**	**Risk assessment to be shared with: Whole School Staff/Governors**		
Considerations	• What was the incident? • Who was involved? • Where did it happen? • Who in the classroom may be vulnerable and why? • Does this incident constitute a crime? Assault, sexual assault, rape, sharing of indecent images of children, etc. As such has this been referred to the police? • Is it necessary to limit contact between the children involved? Refer to KCSiE, safeguarding policy and child-on-child abuse policy. • Is there an actual or perceived threat from the child alleged to have caused harm to the victim and/or others? • Is either the victim or the child alleged to have caused harm at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers)? • Do the 'victim' and 'perpetrator' share classes? • Do they share break times? Do they share peer/friendship groups? • Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school? • Are there times when the child /young person is allowed to leave the classroom? • Are there occasions where there is physical contact between adults/children, children/children? • Do there need to be specific arrangements for moving between classrooms, lunch time, and break? • Do there need to be specific arrangements for the child/young person going to the toilet? • Do there need to be specific arrangements for PE / swimming? • Is there a risk from social media? • At other times who else may be vulnerable and why? • Are the staff that are present in the classroom aware of the risk?			

Hazard	Impact (If it does happen, what is likely to happen to the child?)	Likelihood	Immanence (How soon is the hazard likely to happen?)	What actions need to be or are in place to reduce the risk/ seriousness on the child?

Signed	Print Name	Date

Risk rating system*

SEVERITY			PROBABILITY	
outcome	**Example**	**score**	**Outcome**	**score**
MINOR	Bruising, minor cuts, mild irritation to skin or eyes	**1**	**Unlikely** (eg no previous history)	**1**
SERIOUS	Loss of consciousness , burns, broken bones, injury or condition resulting in 3 or more days absence	**2**	**Possible** (eg similar incidents have happened in the past)	**2**
MAJOR	Permanent disability , major notifiable injury or disease	**3**	**Probable** (eg same situations have happened in the past)	**3**
FATAL	DEATH	**5**	**Highly probable** (eg has occurred recently here or in another organisation)	**5**