Child on Child Abuse Policy

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The School's responsibilities

The Governors, Senior Leadership Team, and all staff at William Harding 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.

William Harding believes that all pupils have a right to attend school and learn in a safe environment free from harm by both adults and other pupils. We recognise that some safeguarding concerns can occur via child on child abuse. In particular, we:

- believe that in order to protect pupils, all schools should:
  - ➢ be aware of the nature and level of risk to which their pupils are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and
  - ➢ 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;
  - ➢ 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
  - ➢ believe that in order to tackle child-on-child abuse proactively, it is necessary to focus on all three of the following areas: *(i) prevention; (ii) identification; and (iii) 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 parents to hold us to account on this issue, so that if their pupil 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, Behaviour Policy, Online Safety, Acceptable Use, Record Keeping, Pupils Missing in Education and Exclusions.
- sets out our strategy for improving prevention, and identifying and appropriately managing child-on-child abuse.
- applies to all governors, the senior leadership team, and staff.
- is 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.
- recognises that abuse 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.
- 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 pupils 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.

What is child-on-child abuse?
child-on-child abuse is any form of physical, sexual, verbal, emotional and financial abuse, and coercive control exercised between pupils, and within pupils' relationships, friendships, and wider peer associations.
child-on-child abuse can take various forms, including (but not limited to):
- serious bullying (including cyber-bullying)
Cyber-bullying can take many forms:
  - Abusive or threatening texts, emails or messages
  - Posting abusive comments on social media sites
  - Sharing humiliating videos or photos of someone else
  - Stealing someone's online identity
  - Spreading rumours online
  - Trolling – sending someone menacing or upsetting messages through social networks, chatrooms or games
  - Developing hate sites about another person
  - Prank calls or messages
  - Group bullying or exclusion online
  - Anonymous messaging
  - Encouraging a young person to self-harm
  - Pressuring children
- pupil sexual exploitation
- harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence
- Racial abuse
- Physical abuse, such as hitting, hair-pulling, shaking, biting or other forms of physical harm
- Sexual abuse, violence and sexual harassment
- Abuse related to sexual orientation or identity
- Sexting (moving and still images)
- Initiation type violence and rituals
- Emotional abuse

Sexually Harmful Behaviour/Sexual Abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)
Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a pupil engages in sexually harmful behaviour and it may be just as distressing to the pupil who instigates it as well as the pupil it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another, sexual assault, rape or abuse.

Sexual Violence

Sexual violence is any sexual activity that takes place without someone's consent. The law also says that anyone under the age of 13 can never consent to sexual activity under any circumstances (Sexual Offences Act 2003). This means that taking part in any type of sexual activity with someone younger than 13 is always a crime. Any sexual activity with a child under 13 should always result in a child protection referral.

Sexual Assault
A person commits an offence of sexual assault if: s/he intentionally touches another person and the touching is sexual and there is no consent. Children under the age of 13 can never legally give consent and so any sexual activity would be a crime.

Sexual Harassment
Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. In referencing sexual harassment, it is in the context of child on child sexual harassment.

Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:
• Sexual comments, such as; telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
• Sexual 'jokes' or taunting;
• Physical behaviour, such as; deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature;
• Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include:
• Non-consensual sharing of sexual images and videos;
• Sexualised online bullying;
• Unwanted sexual comments and messages, including, on social media;
• Sexual exploitation;

Online child-on-child abuse
Online child-on-child abuse is any form of child-on-child abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, child-on-child grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

Upskirting
We recognise that 'Upskirting' involves taking a photograph under an individual's clothing without their knowledge. We understand that it causes the victim distress and humiliation. Staff recognise that 'Upskirting' is a criminal offence and must promptly report any such incidence to the Headteacher, DSL or most senior member of staff. Reference will be made to the following government guidance and part 5 of the **Keeping Pupils Safe in Education, Sept 2020** to ensure that all staff have an understanding of the serious nature of sexual violence and sexual harassment between pupils in schools. [Sexual violence and sexual harassment between pupils in schools and colleges - GOV.UK](#)

What is Contextual Safeguarding?
In order to prevent and tackle child-on-child abuse, we adopt a Contextual Safeguarding approach, which is an approach to understanding, and responding to, the risk of harm to which pupils can be exposed, and/or harm which they can experience, beyond their families. It recognises that the different relationships that pupils form in their neighbourhoods, schools, and online can feature violence, coercive control, and abuse. Parents can have little influence over these contexts, and the risk of harm to which pupils can be exposed, and/or harm which they can experience, outside of the family, can undermine parent-pupil relationships.

Primary school aged pupils
Some aspects of child-on-child abuse are more relevant to different ages of pupils. Bullying, sexualised language, and/ or sexualised behaviour will be relevant and they may present differently in different ages. In addition, the response to concerns/allegations of child-on-child abuse will differ depending on the age of the pupil or pupils in question. For example, the police will take a welfare, rather than a punitive approach, towards pupils aged under 10, which is the age of criminal responsibility in England and Wales.

The following will be considered when dealing with incidents:
•   Whether there is a large difference in power between those involved i.e. size, age, ability, perceived social status or vulnerabilities, including SEND, CP/CIN or LAC

- Whether one of those involved has previously tried to harm or intimidate pupils
- Any concerns about the intentions of the actions

In order to minimise the risk of Child on Child abuse taking place, we:
- Deliver PSHE to include teaching pupils about how to keep safe and understanding what acceptable behaviour looks like
- Ensure that pupils know that all members of staff will listen to them if they have concerns and will act upon them
- Have systems in place for any pupil to be able to voice concerns
- Develop robust risk assessments if appropriate
- Refer to any other relevant policies when dealing with incidents, such as the **Behaviour Policy** and/or the **Anti-Bullying Policy**

Monitoring changes in pupil behaviour

At William Harding we maintain behaviour logs so that we can analyse any behavioural trends that may be emerging across a cohort of pupils, at a particular time of day or in a specific location. We use specific reporting forms for Child on Child abuse and these are passed on to the DSL to analyse and record. CPOMs is also used to record child-on-child abuse as it relates to safeguarding.

We ensure that the language used to describe alleged pupil behaviour is clear and avoids using euphemisms which can prevent potential patterns from being identified.

The internet and social media

The internet can provide pupils with extraordinary positive opportunities, for learning, sharing information and developing key skills, but it can also facilitate harm. We focus on enabling and empowering pupils, staff and parents to navigate the online world in a safe, responsible and positive way via relevant, accurate and engaging training and education.

We include, within our computing curriculum, education about social media from an early age, before pupils start to engage with social media platforms. This is done gradually by weaving age-appropriate discussions into the curriculum, and encouraging safe and positive use of social media.

Our curriculum enables us to:
• 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 recently raised this age limit to 16),
• explain these age limits (as appropriate) to pupils, the reasons for them, and the consequences of breaching them. (Although not illegal, under-age use of social media constitutes a breach of the platform's terms and conditions. It can also mean that these pupils are exposed to material that is not appropriate for their age, and to safeguarding risks. Where a pupil provides a false age of 18 or over, it can mean that they access sites without the additional protections that some sites provide to users under the age of 18. It also means that any liability for harm from the service provider can be waived, because the user has invalidated terms and conditions. If discovered, it can also lead to the pupil's profile, and any content that they shared, being deleted),
• celebrate difference. Not all pupils want to be on social media and pupils should never feel pressured into making choices that are not right for them,
• always encourage pupils 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 pupils with advice on how to *(i) share their concerns with staff in school, (ii) report inappropriate or harmful online content to a platform provider or an independent agency, and (iii) seek support and advice if they are worried, either from the school or from an external body.*

Prevention

We educate our pupils to try to prevent child-on-child abuse by:
- ensuring our PSHE curriculum covers relationships and educates pupils about healthy relationships
- educating our pupils to understand that they have rights over their body – through PSHE and safeguarding assemblies
- educating our staff, parents and pupils about online safety

- ensuring our pupils know who they can talk to if they have concerns
- educating our pupils about their rights from an early age
- tackling any sexual behaviour as soon as we are aware to prevent escalation
- tackling any discrimination or abuse as soon as we are aware
- involving parents and ensuring they are aware of expectations

Identification
We support staff and pupils to identify abuse by:
- recording any concerns about behaviour on CPOMs so all relevant staff members are aware
- providing staff with training during the year to identify child-on-child abuse
- providing pupils with information about their rights so they can identify if they have been abused
- look at historic information
- tackling any sexual behaviour as soon as we are aware to prevent escalation
- involving parents and ensuring they are aware and working with us to prevent this
- ensuring pupils know who they can talk to and having open door policies to allow pupils to seek help
- using the Brook Sexual Behaviours Traffic Light Tool to help distinguish between three levels of sexual behaviour – green, amber and red, and to respond according to the level of concern

Indicators that a child has experienced child-on-child sexual abuse may be physical or behavioural. A child or young person may appear withdrawn, frightened or begin to act differently from usual. They may also display physical signs such as noticeable discomfort.

Response/intervention
If we suspect child-on-child abuse, we will:
- reassure the pupil that they have done the right thing by telling an adult about it
- listen carefully to the child and let them tell their whole story. We won't try to investigate or quiz the pupil, but make sure we understand what they're saying
- not use judgmental language
- remember that a child who is telling us they have abused - is a child in need of support
- tell them that you now have to do what you can to keep them and the other children involved safe
- explain what you are going to do next and that you will need to speak to other people who can help record any concerns about behaviour on the blue form and then CPOMs so all relevant staff members are aware and can monitor
- After the initial disclosure, the blue form is shared immediately with the IPSL, (Lead FLO in her absence), who will determine if it is to be followed up by the teacher, a member of ELT or the safeguarding team.
- ensure we speak to pupils about their behaviour and what may be behind it
- look at historic information to make informed decisions
- tackle any sexual behaviour as soon as we are aware to prevent escalation
- involve external agencies – including those that may already be working with the pupils
- involve parents and ensure they understand what has occurred
- carry out a risk assessment of either individuals and / or locations
- provide a safety plan as needed
- provide support for those involved

Communication and information sharing
When responding to a concern or allegation of child-on-child abuse, we consider carefully, in consultation with social care, the police and other relevant agencies (where they are involved), how to share information about the concern or allegation with the pupil(s) affected, their parents, staff, and other pupils and individuals. When considering whether and how to share information, we consider a number of factors, in consultation with the above (as relevant), and in accordance with the HM Government advice on Information Sharing.

These factors include (but are not limited to) ensuring as far as possible that the information sharing;
(a) does not prejudice any investigation(s)
(b) keeps individuals' personal sensitive data confidential unless it is not appropriate to do so (for example, where we need to share information in order to enable individuals to safeguard and support a pupil)
(c) shares information about a pupil with that pupil's parents unless there are legitimate reasons not to do so

(d) keeps individuals updated on developments where possible and appropriate.

Governors are informed of child-on-child abuse statistics, along with other behaviours, at termly Governor meetings.

Data protection and record keeping

Data protection practices relating to child-on-child abuse are in line with the school's data protection policies and notices. By the same token, our policies and notices reflect and allow sufficiently for safeguarding practices. This includes setting out clearly to parents and pupils what these practices are, and why they are needed, in a privacy notice.

If there are legitimate safeguarding concerns about a pupil, then data protection law will allow schools and professionals 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). We ensure records that are kept, relating to concerns or allegations of child-on-child abuse are accurate, clearly describe the nature of the alleged behaviour without using euphemisms, and contain adequate information.

Records, including behaviour incident logs, individual safety plans and records of any conversations with pupils, their parents, staff, and external agencies – are likely to contain highly impactful, sensitive personal data about pupils. Therefore, records are accessed on a need-to-know basis only by trained and appropriate staff. Those with the responsibility for doing so, know that any records may need to be provided to the pupils involved and/or their parents in the future.

All notes and related communications should always be concise, factual and objective, and focused on what is necessary for the safeguarding purposes. The language used should always be appropriate and professional. The core aim here is to capture any relevant information that could help protect pupils, and important details should never be missed because of unfounded data protection concerns.

Farrer and Co: Child on Child Abuse Toolkit 2019 was used heavily to create this policy
https://www.farrer.co.uk/globalassets/news-articles/downloads/child-on-child-abusetoolkit-14.pdf