Wolsey House Primary School

Child-on-child abuse policy

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1. Context and Definition

It is essential that **all our staff** understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. (KCSIE 2026)

Wolsey House Primary School staff who work with children are advised to maintain an attitude of **'it could happen here'** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best** interests of the child.

Child-on-child abuse is any form of physical, sexual, emotional, online, discriminatory or other harmful behaviour between children. It may be carried out by one child or a group of children and may take place:

- inside or outside school;
- during journeys to or from school;
- in the community;
- online; or
- through a combination of online and face-to-face behaviour.

Child-on-child abuse may be a single incident or a pattern of behaviour. A child does not need to have intended or fully understood the harm caused for the behaviour to require a safeguarding response. Staff will consider the nature and impact of the behaviour, the children's ages and stages of development, any difference in power, the presence of coercion or intimidation, and whether the behaviour is repeated or escalating.

All staff must recognise that children are capable of abusing other children. Child-on-child abuse can include, but is not limited to:

- bullying, including online, prejudice-based and discriminatory bullying;
- physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- serious physical assault or threats of violence;
- sexual violence and sexual harassment
- harmful sexual behaviour;
- causing someone to engage in sexual activity without consent, including forcing someone to strip, touch themselves sexually or engage in sexual activity with another person;
- upskirting;
- consensual or non-consensual creation or sharing of nude or semi-nude images or videos, including AI-generated imagery;
- online abuse, harassment, coercion, impersonation or image-based abuse; and
- initiation/hazing type violence and rituals.

Abuse may be connected to an actual or perceived difference, including sex, race, religion or belief, disability, special educational needs, sexual orientation, gender identity or another personal

characteristic. Racist, faith-targeted, sexist, homophobic, biphobic, transphobic, disablist and other discriminatory behaviour may constitute both a behaviour concern and a safeguarding concern.

Any child can experience or cause child-on-child abuse. However, some children may be more vulnerable to abuse or may face additional barriers to reporting it, including children with SEND or communication needs, children who are looked after or previously looked after, and children who are socially isolated or perceived to be different from their peers.

Children who display abusive or harmful behaviour may themselves have unmet safeguarding, developmental, emotional, health or educational needs. They may have experienced trauma, domestic abuse, neglect, exploitation or other adversity. These needs will be identified and supported, but they do not lessen the school's responsibility to protect other children or address the behaviour.

The immediate safety and welfare of all children will always be the school's first priority. Any concern about possible child-on-child abuse must be reported to the Designated Safeguarding Lead or a deputy without delay and recorded on CPOMS. Staff must not determine for themselves that an incident is insufficiently serious to report. The DSL will consider the circumstances of each case and decide what safeguarding action, support, risk assessment, referral or behaviour response is required.

2. Responsibility

The governing body has overall responsibility for ensuring that the school's safeguarding arrangements comply with statutory requirements and that the Child Protection and Safeguarding Policy includes effective procedures for preventing and responding to child-on-child abuse.

In accordance with *Keeping Children Safe in Education 2026*, the governing body will ensure that the school has:

- procedures to minimise the risk of child-on-child abuse;
- well-promoted, easily understood and accessible systems through which children can confidently report abuse and know that their concerns will be taken seriously;
- clear procedures explaining how concerns and allegations will be recorded, assessed, investigated and managed;
- appropriate arrangements to support children who experience abuse, children alleged to have caused harm and any other children affected;
- systems for identifying and responding to patterns, trends, locations and times associated with increased risk; and
- appropriate safeguarding training for all staff.

The governing body will receive appropriately anonymised information about child-on-child abuse to enable it to monitor the effectiveness of the school's safeguarding arrangements. This will include consideration of patterns, equality implications, online and off-site incidents, the needs of pupils with SEND and any actions taken to reduce risk. Governors will not become involved in the management of individual cases unless this is required as part of their formal role.

The headteacher is responsible for promoting a safe, respectful and inclusive school culture in which child-on-child abuse is not tolerated or dismissed. The headteacher will ensure that this policy is implemented consistently and that appropriate staff, time, training and resources are available.

The Designated Safeguarding Lead and deputies are responsible for:

- receiving and assessing reports and concerns;
- ensuring that immediate protective action is taken where necessary;
- coordinating the school's response and any risk and needs assessment;
- deciding whether referrals or consultations with children's social care, the police or other agencies are required;
- ensuring appropriate support is provided to all affected children;
- liaising with parents or carers and other education settings where appropriate;
- maintaining clear and accurate safeguarding records on CPOMS; and
- reviewing incidents to identify patterns, emerging risks and required preventative action.

All staff are responsible for:

- maintaining an attitude of **"it could happen here"**;
- challenging inappropriate, harmful and discriminatory behaviour;
- listening to children and taking their concerns seriously;
- reporting concerns to the DSL or a deputy without delay;
- recording concerns promptly and accurately on CPOMS;
- following the school's safeguarding procedures; and
- not undertaking their own investigation or promising confidentiality.

Where there is a safeguarding concern, the child's wishes and feelings will be sought and taken into account when decisions are made about action and support. The child will be given information in a way they can understand and kept appropriately informed about what will happen next. The child's wishes are important but will not prevent the school from taking necessary safeguarding action.

The school will respond to concerns promptly, consistently and proportionately. Its first priority will be the immediate safety and welfare of the children involved. The response will also consider the emotional and mental-health impact of the incident, the educational needs of each child and any additional safeguarding or support needs.

This policy forms part of the school's safeguarding arrangements and must be read alongside the **Child Protection and Safeguarding Policy**. It provides more detailed procedures for preventing, identifying, reporting and responding to child-on-child abuse. Where there is any conflict, current statutory safeguarding guidance and the school's Child Protection and Safeguarding Policy will take precedence.

3. Purpose and scope of the policy

The purpose of this policy is to establish a clear, consistent and safeguarding-led approach to preventing, identifying, reporting and responding to child-on-child abuse.

This policy aims to:

- promote a safe, respectful and inclusive culture in which child-on-child abuse is not tolerated or dismissed;
- help staff, pupils and parents or carers understand what child-on-child abuse is and how it may present;
- provide children with clear, accessible and trusted ways to report concerns;
- ensure that all reports and concerns are taken seriously and responded to promptly;
- protect and support children who have experienced harm;
- identify and respond to the safeguarding, educational and support needs of children alleged to have caused harm;

- ensure that risk and needs assessments, referrals, recording and information sharing are undertaken appropriately;
- prevent recurrence by identifying patterns, locations, times and other factors that may increase risk; and
- ensure that the school's response is proportionate, child-centred and consistent with current statutory guidance.

The policy applies to all pupils and to all governors, employees, agency staff, contractors, students and volunteers working on behalf of Wolsey House Primary School.

It applies to child-on-child abuse that takes place:

- on the school premises;
- during school activities, visits, clubs or wraparound provision;
- while travelling to or from school;
- outside school where the behaviour affects a pupil's welfare, safety or education or has an impact within the school community; and
- online, including through social media, messaging services, gaming platforms and the creation or sharing of digital or AI-generated content.

The school may need to respond to an incident even where it took place away from school, involved a pupil from another education setting or occurred outside normal school hours. Where another school or setting is involved, the DSL will liaise with its DSL and relevant agencies as appropriate.

This policy forms part of the school's safeguarding arrangements and should be read alongside the following policies and procedures:

- Child Protection and Safeguarding Policy;
- Behaviour Policy;
- Anti-Bullying Policy, including online and prejudice-based bullying;
- Online Safety Policy;
- Relationships, Sex and Health Education Policy;
- Searching, Screening and Confiscation Policy;
- Suspensions and Permanent Exclusions Policy;
- Staff Code of Conduct;
- Managing Allegations Against Staff and Low-Level Concerns Policy;
- Whistleblowing Policy;
- SEND Policy;
- Equality Policy;
- Attendance Policy;
- Children Missing Education procedures;
- Complaints Policy; and
- Health and Safety Policy.

4. Framework and legislation

This policy has been developed in accordance with relevant legislation and statutory guidance, including:

- Children Act 1989;
- Children Act 2004;

- Education Act 2002, particularly the duty under section 175 to safeguard and promote the welfare of children;
- Equality Act 2010, including the public sector equality duty;
- Human Rights Act 1998;
- Sexual Offences Act 2003;
- Data Protection Act 2018 and UK General Data Protection Regulation;
- *Keeping Children Safe in Education 2026*;
- *Working Together to Safeguard Children 2026*;
- *Sharing nudes and semi-nudes: advice for education settings working with children and young people*, UKCIS, March 2024;
- *Behaviour in Schools*;
- *Searching, Screening and Confiscation*;
- statutory guidance on suspensions and permanent exclusions; and
- statutory guidance for Relationships Education, Relationships and Sex Education and Health Education.

The Education Act 2002 requires governing bodies to make arrangements to safeguard and promote the welfare of children. *Keeping Children Safe in Education 2026* sets out the legal duties that schools must follow to safeguard and promote the welfare of children under the age of 18.

The school will place children's safety, welfare and best interests at the centre of its decision-making. In accordance with *Working Together to Safeguard Children 2026*, assessments and plans will be child-centred and informed by the child's views, wishes, feelings, age, understanding and communication needs.

The child's voice will be sought and taken seriously. Children will be given information in a way they can understand and will be involved appropriately in decisions affecting them. A child's wishes and feelings will inform the school's response but will not prevent the school from taking necessary action to safeguard that child or another person.

The school will respond to child-on-child abuse as both a safeguarding and, where appropriate, a behaviour matter. Safeguarding action, support and proportionate consequences may take place alongside one another. The school will consider the needs and rights of all children involved, make reasonable adjustments where required and ensure that no child is treated less favourably because of a protected characteristic.

Where concerns may involve a criminal offence, significant harm or an immediate risk of harm, the DSL will consider referral to children's social care, the police and other relevant agencies in accordance with local safeguarding partnership procedures. The school will not delay appropriate safeguarding action while waiting for the outcome of an internal behaviour process.

5. Understanding abuse and harmful behaviour

When responding to a concern, the school will consider:

- what has happened and whether the behaviour may be inappropriate, problematic, harmful or abusive;
- the immediate safety and welfare of all children involved;
- the impact of the behaviour on the child who has experienced it;
- the ages, developmental stages, understanding and communication needs of the children involved;

- whether there is a power imbalance, coercion, intimidation, discrimination or exploitation;
- whether the behaviour is a single incident or forms part of a pattern;
- whether similar concerns have previously been recorded;
- whether the behaviour has taken place online, outside school or across more than one setting;
- the support and intervention required for each child;
- whether a referral to children's social care, the police or another agency is required; and
- what action is necessary to prevent further harm.

Child-on-child abuse must never be tolerated, minimised or dismissed as "banter", "part of growing up", "boys being boys" or an ordinary disagreement. Staff must not apply an unnecessarily high threshold before reporting a concern. A serious single incident may constitute abuse, and a child does not need to have intended or fully understood the harm caused for the behaviour to require a safeguarding response.

Not all inappropriate behaviour between children will constitute abuse. Children, particularly younger children or those with additional needs, may display behaviour arising from curiosity, limited understanding, difficulty regulating emotions or unmet developmental needs. However, this must not result in harmful behaviour being overlooked. The DSL will consider the context, development, impact, consent, power imbalance, frequency and level of risk when determining the appropriate response.

Child-on-child abuse can include, but is not limited to:

- bullying, including online, prejudice-based and discriminatory bullying;
- serious physical assault or other physical abuse;
- sexual violence and sexual harassment;
- harmful sexual behaviour;
- consensual or non-consensual creation or sharing of nude or semi-nude images or videos, including AI-generated imagery;
- upskirting and other forms of image-based abuse;
- abuse within children's intimate or personal relationships;
- coercive, controlling, threatening or intimidating behaviour;
- forcing another child to undress, touch themselves sexually or engage in sexual activity;
- online abuse, harassment, impersonation or exploitation; and
- initiation or hazing-type violence and rituals.

The school recognises that technology can facilitate or intensify abuse. Online behaviour may occur alongside face-to-face abuse and may continue beyond the school day. Content may be copied, altered, generated using artificial intelligence or distributed rapidly to a wide audience. Online incidents involving pupils will therefore be treated as safeguarding concerns where they affect a child's safety, welfare or education or the wider school community.

Children who have experienced harm

Children who experience child-on-child abuse will be listened to, protected and supported. Their wishes and feelings will inform the school's response, and they will not be blamed or made responsible for resolving the situation. The school will consider the impact on their emotional wellbeing, mental health, attendance, learning, friendships and sense of safety.

The school will seek to avoid arrangements that unnecessarily disadvantage or isolate the child who has experienced harm. Wherever reasonably possible, that child should not be required to change classes, routines or activities solely to manage the behaviour of another child.

Children alleged to have caused harm

A child alleged to have caused harm may also have unmet safeguarding, developmental, educational or emotional needs. The behaviour may be connected to trauma, abuse, exploitation, exposure to harmful material, difficulties with communication or emotional regulation, SEND or other adverse experiences. These possibilities will be considered without making assumptions about the child's history.

Identifying and supporting these needs does not remove the child's responsibility for their behaviour or reduce the school's duty to protect others. Safeguarding support and proportionate consequences may be provided alongside one another.

The school will use neutral, child-centred language such as **"the child who has experienced harm"** and **"the child alleged to have caused harm"** wherever appropriate. The terms used will be considered case by case, taking account of the children's wishes and avoiding language that unnecessarily labels a child before the facts have been established.

Any plan to reduce the risk of further harm will address both the behaviour and the child's underlying needs. It will include clear protective measures, appropriate support, identified responsibilities and regular review.

6. Types of child-on-child abuse

Child-on-child abuse can take many forms. The examples below are not exhaustive, and different forms of abuse may overlap. Abuse may occur as a single serious incident or as a pattern of behaviour, face to face or online, inside or outside school.

Staff must report any concern about possible child-on-child abuse to the Designated Safeguarding Lead or a deputy without delay and record it on CPOMS. The DSL will determine the appropriate safeguarding, behaviour and support response.

6.1 Physical abuse

Physical abuse may include:

- hitting, kicking, punching, slapping or shaking;
- biting, pinching or hair pulling;
- pushing, tripping or restraining another child;
- throwing objects;
- deliberately causing injury;
- serious physical assault;
- threatening another child with violence or a weapon; and
- encouraging, filming or assisting an assault.

Not every physical incident between children will constitute abuse. Accidents, developmentally typical conflict and impulsive behaviour must be distinguished from deliberate, coercive, repeated or seriously harmful behaviour. However, the absence of an intention to cause harm does not mean that an incident should be ignored.

The school will consider the nature and impact of the incident, the children's ages and development, any power imbalance, previous incidents, the risk of recurrence and any unmet needs. Immediate safety, first aid and safeguarding action will take priority. Support and proportionate consequences may be provided alongside one another in accordance with the Behaviour Policy.

6.2 Sexual violence and sexual harassment

Any report or concern involving sexual violence or sexual harassment must be referred to the DSL or a deputy immediately. The DSL will respond in accordance with Part Five of *Keeping Children Safe in Education 2026* and local safeguarding partnership procedures.

Sexual violence and sexual harassment can occur between children of any age or sex. It may involve one child or a group of children and can take place face to face, online or through technology.

Sexual violence refers to sexual offences including rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent. This may include forcing a child to strip, touch themselves sexually or engage in sexual activity with another person.

Consent must be freely given and can be withdrawn at any time. A child may be unable to consent because of their age, understanding, disability, coercion, fear or an imbalance of power. A child under the age of 13 cannot legally consent to sexual activity.

Sexual harassment is unwanted conduct of a sexual nature that violates a child's dignity or makes them feel intimidated, degraded, humiliated or unsafe. It may include:

- sexual comments, jokes, stories or name-calling;
- sexualised bullying or rumours;
- comments about bodies, clothing or appearance;
- displaying sexual material;
- unwanted sexual attention;
- deliberately brushing against or touching another child;
- interfering with clothing, including pulling clothing down or lifting skirts;
- sexualised online messages or comments;
- pressuring a child to share sexual content;
- misogynistic or misandrist language or behaviour; and
- making, sharing or threatening to share sexual images.

Sexual harassment may be a single incident, part of a pattern or an element of wider harmful sexual behaviour. It must never be dismissed as "banter", curiosity or an inevitable part of growing up.

6.3 Harmful sexual behaviour

Harmful sexual behaviour describes sexual behaviour displayed by children that is developmentally inappropriate, problematic or abusive and that may cause harm to the child or another person.

It may include:

- inappropriate or intrusive sexual language;
- repeated sexualised behaviour that does not respond to redirection;
- coercive or intimidating sexual behaviour;
- inappropriate sexual touching;
- sexual assault;
- pressuring another child to participate in sexual behaviour;

- exposing another child to sexual material; or
- using technology to create, request, alter or share sexual content.

Children's sexual behaviour exists on a continuum. The DSL will consider the children's ages and developmental stages, consent, coercion, power imbalance, frequency, persistence, secrecy, impact and the context in which the behaviour occurred.

The child displaying harmful sexual behaviour may also have safeguarding or support needs. These will be assessed without minimising the harm experienced by another child or compromising anyone's safety.

6.4 Bullying

Bullying is behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group physically or emotionally. It commonly involves a real or perceived imbalance of power.

Bullying may include:

- physical or verbal attacks;
- threats or intimidation;
- spreading rumours;
- deliberate exclusion;
- damaging or taking possessions;
- humiliating or degrading another child; and
- targeting someone because of an actual or perceived difference.

A serious one-off incident may not meet the school's definition of bullying but may still constitute child-on-child abuse and require a safeguarding response.

Concerns about bullying will be addressed in accordance with the Anti-Bullying Policy. Where bullying may also constitute abuse or create a safeguarding risk, the safeguarding procedures in this policy will apply.

6.5 Online abuse and online bullying

Online abuse is harmful behaviour facilitated through digital technology. It may take place through social media, messaging services, email, livestreams, gaming platforms, shared documents, websites or other online services.

It may include:

- abusive, threatening or intimidating messages;
- spreading rumours or posting humiliating content;
- sharing photographs or videos without consent;
- impersonating another person or accessing their account;
- deliberately excluding someone from an online group;
- creating hate accounts, pages or groups;
- persistent or anonymous harassment;
- encouraging self-harm, violence or other harmful behaviour;
- coercing or pressuring a child to engage in sexual conversation or activity;
- requesting or sharing nude or semi-nude imagery;
- using artificial intelligence to create or alter harmful or sexualised content; and

- recording or livestreaming abuse.

Online abuse may continue beyond the school day and can reach a large audience quickly. The school may respond to online behaviour occurring outside school where it affects a pupil's safety, welfare or education or has an impact on the school community.

6.6 Sharing nude and semi-nude images or videos

This includes the consensual or non-consensual creation, sharing or distribution of nude or semi-nude images, videos or livestreams involving a child. It also includes digitally altered or AI-generated sexual or nude imagery that depicts or appears to depict a child.

This behaviour is sometimes referred to as "sexting", but the school will use the more precise term **sharing nudes and semi-nudes**.

Any concern must be reported to the DSL or a deputy immediately. Staff must not:

- view an image unless there is a clear and unavoidable safeguarding reason;
- copy, print, forward, download or share it;
- ask a child to send or show it to them;
- save it to CPOMS or another school system; or
- delete it from a device before the DSL has considered whether evidence must be preserved.

The DSL will follow the current UKCIS guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people*.

6.7 Upskirting and other image-based abuse

Upskirting involves operating equipment beneath a person's clothing, without their consent, to create an image of their genitals or buttocks, whether covered by underwear or not, for sexual gratification or to cause humiliation, alarm or distress. It is a criminal offence and can affect a person of any sex.

Other image-based abuse may include:

- taking, altering or sharing intimate or sexualised images without consent;
- threatening to share an image;
- placing a child's face onto a sexual or nude image;
- creating AI-generated "deep nudes"; or
- photographing or filming a child in a private situation without consent.

Any such concern must be reported immediately to the DSL.

6.8 Initiation and hazing

Initiation or hazing refers to rituals, challenges or activities used to initiate a child into a group, team or friendship group. It may involve humiliation, intimidation, harassment, coercion, physical harm, sexual behaviour, forced consumption of substances, criminal activity or online abuse.

Apparent agreement or participation does not necessarily mean that meaningful consent was given, particularly where there is peer pressure, fear of exclusion or a power imbalance.

6.9 Prejudice-based and discriminatory abuse

Prejudice-based or discriminatory abuse is behaviour directed at a child because of an actual or perceived aspect of their identity or circumstances. It may relate to:

- race, ethnicity, nationality or culture;
- religion or belief;
- sex;
- sexual orientation;
- gender identity;
- disability or SEND;
- appearance;
- care experience;
- family circumstances;
- poverty or social background; or
- another actual or perceived difference.

It may include verbal abuse, physical harm, exclusion, intimidation, harassment, online abuse, damage to property or the use of discriminatory language or imagery.

Racist, faith-targeted, sexist, homophobic, biphobic, transphobic and disablist incidents will be recorded and responded to appropriately. A discriminatory incident may be both a behaviour matter and a safeguarding concern.

6.10 Abuse within intimate or personal relationships

Children may experience abuse within a current or former intimate, romantic or close personal relationship. Although this may be more common among older children, primary-aged children may describe relationships as “boyfriend”, “girlfriend” or another close relationship, and age must not prevent staff from recognising concerning behaviour.

This abuse may include:

- controlling who someone speaks to or spends time with;
- isolating a child from friends;
- monitoring messages, accounts or location;
- demanding passwords;
- insults, humiliation or threats;
- coercion or intimidation;
- physical or sexual harm;
- pressuring a child to share images or engage in sexual behaviour; and
- threatening self-harm or retaliation to control another child.

Abuse may occur in relationships involving children of any sex or sexual orientation. It may also indicate child sexual exploitation or another form of abuse and must be referred to the DSL.

7. Expected staff action

All staff must respond to concerns and reports of child-on-child abuse promptly, calmly and consistently. The immediate safety and welfare of the children involved must be the first consideration.

Any concern that a child may have experienced or caused child-on-child abuse, whether inside or outside school or online, must be reported to the Designated Safeguarding Lead or a deputy without

delay. Staff must not delay reporting while attempting to determine whether the behaviour meets a particular threshold or definition.

7.1 Immediate safety

Where there is an immediate risk of harm, staff will:

- take reasonable steps to separate the children involved;
- obtain first aid or urgent medical assistance where required;
- ensure appropriate supervision;
- preserve any potential evidence;
- contact the DSL or a deputy immediately; and
- contact the emergency services where there is an immediate danger or serious injury.

Staff must not place themselves or others at unreasonable risk when intervening.

7.2 Responding to a disclosure or report

When a child reports abuse or harmful behaviour, staff will:

- listen carefully and remain calm;
- take the child seriously;
- reassure the child that they have done the right thing by reporting the concern;
- make clear that the child is not to blame for what has happened;
- avoid expressing shock, disbelief or judgement;
- use the child's preferred language when describing what has happened;
- explain that the information must be shared with the DSL so that the school can help keep people safe;
- avoid promising confidentiality;
- ask only open and necessary questions to clarify the immediate concern;
- avoid leading questions or asking the child why the incident happened;
- avoid repeatedly asking the child to recount their experience;
- establish whether anyone is in immediate danger or requires medical assistance;
- explain, in an age-appropriate way, what will happen next; and
- report the concern to the DSL or a deputy without delay.

Staff should not ask a child to provide a written statement unless this has been agreed with the DSL. They must not bring the children together to establish "what really happened", mediate the incident or ask them to apologise or reconcile.

7.3 Recording the concern

The member of staff receiving the report or witnessing the incident must make a prompt and accurate record on CPOMS. This should include:

- the date, time and location of the incident or disclosure;
- the names of the children involved;
- the child's own words wherever possible;
- what the member of staff observed or was told;
- any injuries or immediate safety concerns;
- any action taken;
- who the concern was reported to and when; and
- any other people who witnessed the incident.

Records must be factual and clearly distinguish between what was seen or heard, what the child said and the member of staff's professional opinion. Staff must not include speculation or inappropriate personal comments.

A verbal report to the DSL must not be delayed because the written CPOMS record has not yet been completed. Where the concern is urgent, the DSL must be contacted first and the record completed as soon as possible afterwards.

7.4 Preserving evidence

Staff must take reasonable steps to preserve evidence without investigating the matter themselves. They should not:

- search a child or their possessions unless authorised and acting in accordance with the Searching, Screening and Confiscation Policy;
- ask children to delete messages, images, videos or accounts;
- forward, copy, print or download digital content;
- take screenshots using a personal device;
- question multiple children or collect statements independently; or
- contact parents, other schools or external agencies without first consulting the DSL, unless emergency action is required to protect a child.

Where nude or semi-nude imagery may be involved, staff must not view the imagery unless there is an unavoidable and clearly justified safeguarding reason. The device should be secured where appropriate and the DSL informed immediately.

7.5 Following the report

The DSL will determine the next steps. These may include:

- putting immediate safety arrangements in place;
- speaking separately with the children involved;
- completing a risk and needs assessment;
- consulting or referring to children's social care, the police or another agency;
- liaising with another school or setting;
- informing parents or carers where appropriate;
- arranging support for the children affected;
- considering action under the Behaviour Policy; and
- monitoring and reviewing the arrangements.

Staff must maintain appropriate confidentiality and share information only with those who need it for safeguarding purposes. They must continue to be alert to changes in the children's behaviour, wellbeing, attendance, relationships or engagement with learning and report any further concerns.

8. Assessment and decision-making

The DSL will assess every report or concern about possible child-on-child abuse and determine the appropriate safeguarding response. This assessment will be child-centred, proportionate and informed by the circumstances of the individual case.

The DSL will consider:

- the chronological and developmental ages of the children involved;
- the nature, seriousness and impact of the behaviour;

- whether the behaviour may be developmentally expected, inappropriate, problematic or abusive;
- any difference in age, size, social influence, authority, understanding or emotional development;
- any power imbalance, coercion, intimidation, threat, bribery, exploitation or secrecy;
- whether the behaviour was consensual and whether the children had the freedom and capacity to consent;
- whether sexualised behaviour involved knowledge or actions that were unusual for the child's age or stage of development;
- any physical injury, sexual harm, emotional harm or online impact;
- the wishes, feelings and needs of the child who has experienced harm;
- the needs, vulnerabilities and circumstances of the child alleged to have caused harm;
- any SEND, communication, health, trauma or safeguarding needs affecting either child;
- whether the behaviour was discriminatory or connected to a protected characteristic;
- whether the incident was planned, impulsive or influenced by others;
- whether it was a single incident or part of a repeated, escalating or wider pattern;
- whether other children may have been affected or remain at risk;
- whether the incident occurred online or continues to present an online risk;
- any relevant previous concerns or interventions; and
- the risk of retaliation, intimidation, social isolation, rumours or further harm.

Intent may be relevant to the assessment, but it will not determine whether safeguarding action is required. A child may cause significant harm without intending or fully understanding the consequences of their behaviour.

8.1 Gathering information

The DSL will coordinate any necessary fact-finding. Children will normally be spoken to separately and in a calm, sensitive and developmentally appropriate manner.

Only sufficient information will be gathered to understand:

- what is reported to have happened;
- when and where it happened;
- who was involved or witnessed it;
- whether anyone is injured or at immediate risk; and
- whether evidence needs to be preserved.

Open prompts such as **"Tell me what happened"** or **"Explain what you mean"** may be used. Leading, repetitive or accusatory questions will be avoided. Children will not ordinarily be asked "why" the incident occurred, as this may imply blame or require them to explain behaviour they do not fully understand.

The school will avoid carrying out an investigation that could prejudice enquiries by children's social care or the police. Where external agencies are involved, the DSL will seek and follow their advice about further discussions with the children.

8.2 Risk and needs assessment

The DSL will consider whether a written risk and needs assessment is required. An immediate written risk and needs assessment will be completed following a report of sexual violence. The need

for one following sexual harassment or another form of child-on-child abuse will be considered on a case-by-case basis.

The school's Child-on-Child Abuse Risk and Needs Assessment form is held separately from this policy. The DSL or a deputy DSL will complete the form where an assessment is required and ensure that it is stored securely as part of the relevant safeguarding records on CPOMS. The assessment will identify the actions required, the staff responsible for implementing them and the date on which the arrangements will be reviewed.

The assessment will consider:

- the safety and support needs of the child who has experienced harm;
- the needs and risks associated with the child alleged to have caused harm;
- the safety of other children and staff;
- the location, timing and circumstances of the incident;
- supervision and arrangements during lessons, social times and journeys;
- online and off-site risks;
- how each child can continue to access education safely; and
- the actions required, who is responsible and when the assessment will be reviewed.

The assessment will be recorded on CPOMS, kept under regular review and updated whenever circumstances or risks change.

8.3 Referrals and external agencies

The DSL will decide whether the concern requires:

- management and support within school;
- early help or family help;
- consultation or referral to children's social care through the current local referral process;
- referral to the police;
- medical assistance or specialist sexual-assault support;
- support from health, SEND, mental-health or other services; or
- liaison with another school or education setting.

Where there is an immediate danger or serious injury, the emergency services will be contacted without delay. Safeguarding action will not be delayed while the school completes an internal behaviour investigation.

8.4 Informing parents and carers

Parents or carers of the children involved will normally be informed as soon as it is appropriate to do so. The DSL will decide how and when this contact should take place.

Parents or carers will not be informed before advice has been sought where doing so could:

- place a child or another person at increased risk;
- prejudice an investigation by children's social care or the police;
- lead to the loss or destruction of evidence; or
- conflict with advice from a statutory agency.

Communication may take place face to face or by telephone, depending on the seriousness, urgency and circumstances of the case. Separate communication will normally take place with each family, and confidential information about another child will not be disclosed.

Parents or carers will be informed about the concerns relating to their own child, the action the school is taking, the support available and how the arrangements will be reviewed. They will be reminded not to approach another child or family directly or discuss the incident publicly or online.

9. Points to consider when assessing behaviour

The following prompts may support the DSL's professional judgement. They must not be used as a checklist to determine automatically whether abuse has occurred. The individual circumstances, impact and needs of all children involved must be considered.

9.1 Age and stage of development

The DSL will consider:

- the chronological and developmental ages of the children;
- any difference in age, maturity, understanding, size or social influence;
- each child's communication abilities and needs;
- whether the behaviour is developmentally expected, inappropriate, problematic or abusive; and
- whether either child has SEND or another need that may affect their understanding, communication, regulation or vulnerability.

Young children may show natural curiosity about bodies, privacy and toileting as part of their development. This does not automatically indicate abuse. However, sexualised behaviour must not be overlooked merely because the children are young.

Concern may be increased where behaviour is:

- persistent, compulsive, coercive or secretive;
- significantly outside what would be expected for the child's development;
- distressing or harmful to the child or another person;
- resistant to appropriate adult redirection;
- associated with force, threats, bribery or an imbalance of power; or
- suggestive of sexual knowledge beyond what would ordinarily be expected for the child's age and circumstances.

9.2 Location, timing and supervision

The DSL will consider:

- where and when the incident took place;
- whether it occurred in a public, private or less-supervised area;
- whether the location was selected to avoid observation;
- whether the incident took place during a transition, social time, club, journey or school visit;
- whether it occurred online or continued outside school;
- who witnessed or may have information about the incident;
- whether CCTV or other lawful evidence may be available; and
- whether supervision, staffing, routines or the physical environment need to be changed.

The location of an incident does not determine its seriousness. Harmful behaviour can occur in both open and concealed settings.

9.3 Children's accounts

Each child should be given an appropriate opportunity to explain what happened in their own words. Children should normally be spoken to separately.

The DSL will consider:

- what each child reports having seen, heard, experienced or done;
- how each child describes the impact of the incident;
- whether the child appears frightened, distressed, confused or reluctant to speak;
- whether coercion, intimidation, loyalty, shame or fear of consequences may affect what the child says;
- whether communication needs or developmental differences require reasonable adjustments; and
- whether further questioning should be left to children's social care or the police.

Children may remember, understand or describe the same incident differently. Differences between accounts must not automatically be treated as evidence that a child is being dishonest. Staff should not attempt to force agreement between the children.

9.4 Understanding, consent and power

The DSL will consider:

- what each child understood about the behaviour;
- whether the child understood bodily autonomy, privacy and personal boundaries;
- whether any agreement or participation was freely given;
- whether either child felt pressured, frightened, intimidated or unable to withdraw;
- any difference in age, maturity, status, popularity, ability or social influence;
- whether gifts, threats, bribery or promises were involved;
- whether the behaviour was planned or encouraged by others;
- whether either child understood the likely impact of the behaviour; and
- whether another child recorded, shared or encouraged the incident.

A lack of understanding or intent may influence the support and intervention provided, but it does not remove the need to address harm or protect other children.

9.5 Nature, impact and context

The DSL will consider:

- the type and seriousness of the behaviour;
- whether physical injury, sexual harm or emotional distress occurred;
- the effect on the child's wellbeing, attendance, learning, relationships and sense of safety;
- whether the behaviour was discriminatory or targeted an actual or perceived difference;
- whether there is an online element or risk of wider distribution;
- whether the behaviour may be connected to exploitation, domestic abuse or another safeguarding concern;
- whether other children witnessed or were affected by the incident; and
- whether any child requires medical, emotional or specialist support.

The response will not be based solely on what the child alleged to have caused harm intended. The impact and ongoing risk must also be considered.

9.6 Repetition, patterns and escalation

The DSL will consider:

- whether this was a single incident or part of a pattern;
- whether the behaviour has involved the same or different children;
- whether previous concerns, warnings, support or interventions have been recorded;
- whether the behaviour has continued after boundaries were explained;
- whether its frequency, severity or level of coercion is increasing;
- whether similar behaviour has occurred online, outside school or in another setting; and
- whether there may be other children who have not yet reported concerns.

Repetition may increase the level of concern, but a single serious incident can constitute child-on-child abuse and require immediate safeguarding action.

9.7 Wider needs and vulnerabilities

The DSL will consider whether either child has:

- SEND, communication or sensory needs;
- physical or mental-health needs;
- experienced trauma, abuse, neglect or disrupted relationships;
- a social worker or existing family help or care plan;
- difficulty understanding relationships, consent or online risk;
- experienced discrimination or social isolation; or
- other circumstances that may increase vulnerability or affect the support required.

These considerations must inform reasonable adjustments and support but must not be used to excuse harmful behaviour or reduce protection for another child.

10. Support, intervention and follow-up

Support, protective action and risk management will begin as soon as a concern is identified. The school will not wait for the conclusion of an internal or external investigation before putting appropriate support and safety arrangements in place.

The response will be proportionate to the nature, impact and circumstances of the incident. It will recognise that the children involved may have different and potentially conflicting needs.

10.1 Support for the child who has experienced harm

The child will be listened to and involved appropriately in decisions about their support and safety. Support will be tailored to their age, development, communication needs, wishes and circumstances.

Support may include:

- a named trusted adult and regular check-ins;
- pastoral or emotional support;
- counselling or support from an external service;
- adjustments to lessons, social times, transitions or travel arrangements;
- support with friendships and peer relationships;
- a safe place or agreed method of seeking help;
- support relating to attendance, anxiety or reintegration;

- online-safety advice and assistance with reporting or removing content;
- reasonable adjustments for SEND or health needs;
- support for the child's family; and
- referral to health, children's social care, police or specialist services.

The school will seek to minimise disruption to the child's education. Wherever reasonably possible, the child who has experienced harm should not be required to change classes, routines or activities solely to manage the behaviour of another child.

The child will not be required to meet, forgive, reconcile with or participate in restorative work with the child alleged to have caused harm. Restorative work will only be considered where:

- the child who experienced harm wishes to participate;
- it is assessed as safe and appropriate;
- it will not interfere with an external investigation;
- there is no coercion or pressure; and
- appropriately trained staff or professionals are available to facilitate it.

10.2 Support and management of the child alleged to have caused harm

The school will consider the child's safeguarding, developmental, emotional, educational and health needs alongside the need to protect others and address the behaviour.

The DSL may consider whether the behaviour is connected to:

- experience of abuse, neglect, trauma or domestic abuse;
- exploitation or exposure to harmful sexual material;
- SEND or communication needs;
- difficulty understanding consent, privacy or relationships;
- mental-health or emotional-regulation needs;
- peer pressure or group dynamics;
- family circumstances; or
- other unmet needs.

This assessment will not excuse harmful behaviour or reduce the protection provided to another child. Appropriate support and proportionate consequences may be provided alongside one another.

Support or intervention may include:

- work with a trusted adult;
- clear teaching about boundaries, consent and safe relationships;
- a pastoral or individual behaviour-support plan;
- reasonable adjustments;
- increased supervision or changes to routines;
- online-safety education and restrictions;
- family help or early-help support;
- support from health, SEND, mental-health or specialist services;
- referral to children's social care or the police; and
- specialist assessment or intervention relating to harmful sexual behaviour.

The child must not be labelled as an "abuser" or "sex offender". Staff will distinguish the child from the behaviour while maintaining clear expectations, accountability and boundaries.

10.3 Risk management and education arrangements

Where the behaviour may continue to present a risk, the DSL will complete or update a written risk and needs assessment and safety plan. This will identify:

- the risks and needs of each child;
- appropriate supervision and contact arrangements;
- any changes to lessons, social times, movement or transport;
- online and off-site risks;
- the staff responsible for implementing each action; and
- regular review dates.

A police or children's social care investigation does not automatically mean that the child alleged to have caused harm must be educated away from the school site. Interim arrangements will be determined individually through the risk and needs assessment and, where appropriate, in consultation with relevant agencies.

Any consequence will be imposed in accordance with the Behaviour Policy and statutory guidance. This may include removal from the classroom or, where the statutory test is met, suspension. Suspension will not be used automatically or as a neutral holding measure simply because an investigation is taking place.

Where education on site cannot safely continue temporarily, the school will follow the appropriate statutory processes and ensure that suitable education and support are provided.

10.4 Ongoing support and review

The DSL will ensure that arrangements are reviewed regularly and whenever circumstances change. Reviews will consider:

- whether the children feel safe;
- whether further incidents, intimidation or retaliation have occurred;
- emotional wellbeing and mental health;
- attendance and engagement with education;
- friendships, isolation and peer-group dynamics;
- online activity, rumours or image sharing;
- whether support and protective arrangements remain effective; and
- whether the risk and needs assessment requires amendment.

Delayed distress, remorse, anxiety, self-harm or other changes in behaviour may arise after the incident. Staff must report any further concerns to the DSL and record them on CPOMS.

Support will not end solely because an investigation has concluded or no further action has been taken by an external agency.

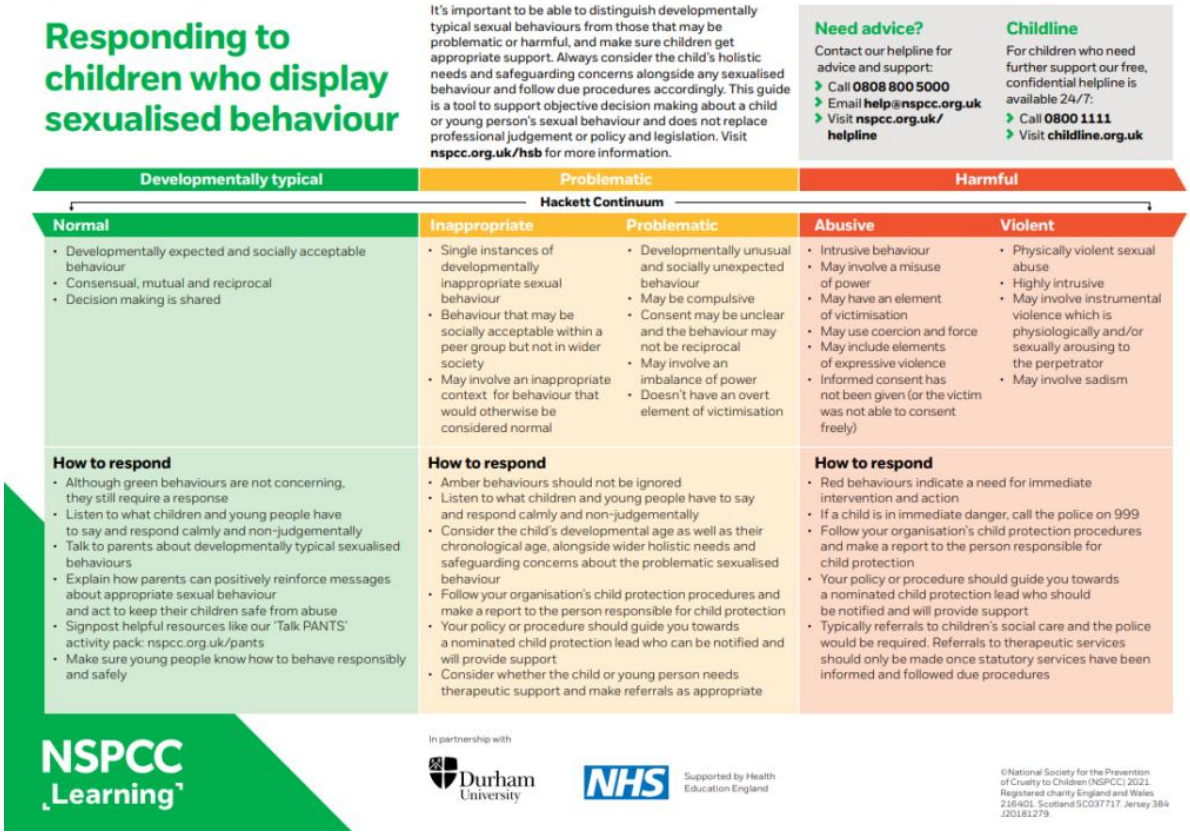
11. Preventative strategies

Child-on-child abuse can occur in any school, including where robust safeguarding arrangements are in place. The absence of reported incidents does not mean that abuse is not occurring. Wolsey House Primary School will maintain an attitude of **"it could happen here"** and take proactive steps to prevent harm.

The school will promote a safe, respectful and inclusive culture by:

- setting clear expectations for respectful behaviour and relationships;
- challenging sexualised, discriminatory, degrading or harmful language and behaviour;
- ensuring that concerns are not dismissed as "banter" or an inevitable part of growing up;
- protecting children's dignity and avoiding unnecessary shame or public exposure;
- making clear that reporting concerns is encouraged and will not be treated as causing trouble;
- providing accessible reporting routes, including trusted adults and adaptations for children with SEND or communication needs;
- ensuring that staff understand how to recognise, report and respond to child-on-child abuse;
- working with parents, carers and external agencies;
- identifying and supervising locations and times where concerns are more likely to arise; and
- analysing incidents to identify patterns, trends and required changes.

Hackett continuum



The Hackett Continuum is a professional aid and must not be used as a standalone diagnostic or referral tool. Behaviour may move between categories depending on the child's age and development, frequency, persistence, context, consent, coercion, power imbalance and impact. Any concern must be reported to the DSL, who will consider the appropriate safeguarding response and whether consultation or referral to external agencies is required.

11.1 Curriculum and education

Through Relationships Education, Health Education, PSHE, online-safety teaching, assemblies and wider curriculum opportunities, pupils will be taught in an age-appropriate way about:

- respectful relationships and friendships;

- bodily autonomy and personal boundaries;
- privacy and consent;
- recognising safe and unsafe behaviour;
- bullying and discriminatory behaviour;
- gender stereotypes, sexism and misogyny;
- online behaviour, gaming and social media;
- sharing images and the permanence of online content;
- AI-generated and digitally altered imagery;
- seeking help and reporting concerns;
- responding safely when they witness harmful behaviour; and
- how and where to obtain support.

Teaching will be adapted appropriately for pupils' ages, stages of development and SEND or communication needs.

Whole-class or year-group work may be used where it will strengthen understanding or address a wider cultural concern. It must not identify the children involved in a particular incident or replace individual safeguarding action.

11.2 Pupil voice and reporting

Children will be involved in developing and reviewing the school's approach through school council, pupil voice, safeguarding discussions and other age-appropriate opportunities.

Children may report a concern to any member of staff, including their class teacher, teaching assistant, a member of the pastoral team, the DSL or a deputy DSL. A child may report verbally, in writing, through drawing or by using a worry box. Children will not be expected to use a particular method or speak to a particular adult before their concern is taken seriously. Staff will make reasonable adjustments so that pupils with SEND or communication needs can report concerns safely and be understood

The school will regularly check whether children:

- know how and where to report a concern;
- have adults they trust;
- believe that adults will listen and take action;
- feel safe in lessons, social times and less-supervised areas;
- feel safe online; and
- understand what respectful behaviour and relationships look like.

Reporting arrangements will be well promoted, easily understood and accessible. Children will be reminded that they may report something that has happened to them, another child or a group of children.

11.3 Monitoring and review

The DSL and senior leaders will monitor anonymised information about child-on-child abuse, including:

- the nature and frequency of concerns;
- locations, times and activities associated with incidents;
- online and off-site concerns;
- repeated involvement of individuals or groups;

- SEND, equality and protected-characteristic considerations;
- attendance and wellbeing effects;
- the effectiveness of interventions; and
- staff training or supervision needs.

Relevant anonymised information will be reported to the governing body to support oversight and future preventative action.

Responding to sexual violence, sexual harassment or harmful sexual behaviour

Wolsey House Primary School • Staff safeguarding flowchart

1 — Make the child safe and respond appropriately

Listen, reassure and take the report seriously. Do not promise confidentiality or ask leading questions. Obtain first aid, medical help or emergency assistance if required.

2 — Report immediately

Inform the DSL or a deputy without delay. Make an accurate, factual record on CPOMS. Urgent verbal reporting must not wait for the written record.

3 — Initial safeguarding assessment

The DSL considers immediate safety, the children's wishes and needs, the nature and context of the concern, preservation of evidence and whether external advice is needed.

4 — Complete a risk and needs assessment

An immediate written assessment is required following a report of sexual violence. For sexual harassment or other harmful sexual behaviour, consider this case by case. Address the safety and needs of every child affected.

5 — Determine the response

The DSL may use one or more routes:

- support and management within school
- Family Help or other early support
- children's social care and/or police referral
- health or specialist services
- liaison with another education setting

6 — Inform parents or carers where appropriate

Do not inform them first if this could increase risk, prejudice an investigation or conflict with advice from children's social care or the police.

7 — Support, protect and educate

Put proportionate arrangements in place without waiting for an external investigation. Avoid unnecessarily disrupting the education of the child who experienced harm.

8 — Consider the behaviour response

Apply appropriate, proportionate consequences under the Behaviour Policy. A police decision not to pursue the case does not prevent school action based on the school's own assessment.

9 — Record, monitor and review

Record decisions and reasons on CPOMS. Monitor safety and wellbeing and review the risk and needs assessment whenever circumstances change and at agreed intervals.

Immediate danger or serious injury: contact emergency services without delay

Together we grow, achieve and thrive.

12. Further information, statutory guidance and professional resources

This policy has been informed by the following legislation, statutory guidance and professional resources. The school will refer to the most recent version of each document where it has subsequently been updated.

12.1 Principal statutory safeguarding guidance

- Department for Education, Keeping Children Safe in Education 2026, particularly Parts One, Two and Five.
- Department for Education, Working Together to Safeguard Children 2026.

12.2 Sexual violence, sexual harassment and harmful sexual behaviour

- UK Council for Internet Safety, Sharing nudes and semi-nudes: advice for education settings working with children and young people, updated March 2024.
- Centre of Expertise on Child Sexual Abuse, Children and young people who display harmful sexual behaviour.
- NICE, Harmful sexual behaviour among children and young people – recommendations.
- NSPCC Learning, Understanding sexualised behaviour in children.
- Brook, Sexual Behaviours Traffic Light Tool training.

The Brook Traffic Light Tool and Hackett continuum are professional aids. They must not replace safeguarding procedures, risk assessment or professional judgement and should only be used by staff with appropriate knowledge or training.

12.3 Behaviour, bullying, searching and exclusion

- Department for Education, Behaviour in Schools, updated February 2024.
- Department for Education, Preventing bullying.
- Department for Education, Searching, Screening and Confiscation, July 2022.
- Department for Education, School suspensions and permanent exclusions, statutory guidance effective from 26 July 2026.

12.4 Relationships, health and online-safety education

- Department for Education, Relationships Education, Relationships and Sex Education and Health Education, revised statutory guidance effective from 1 September 2026.
- Department for Education, Teaching Online Safety in Schools, updated January 2023.
- UK Council for Internet Safety, Education for a Connected World.
- Department for Education, Mental health and behaviour in schools.

12.5 Equality and inclusion

- Department for Education, Equality Act 2010: advice for schools.
- Equality and Human Rights Commission, Public Sector Equality Duty guidance.

These resources should be considered when responding to prejudice-based or discriminatory child-on-child abuse and when making reasonable adjustments for disabled pupils.

12.6 Attendance and children missing education

- Department for Education, Children Missing Education: statutory guidance for local authorities and schools, updated September 2025.

12.7 Police and multi-agency procedures

- National Police Chiefs' Council, When to Call the Police: guidance for schools and colleges.
- Leicester, Leicestershire and Rutland Safeguarding Children Partnerships Procedures Manual.
- Leicester, Leicestershire and Rutland Harmful Sexual Behaviour procedure.

The local procedures manual includes a Harmful Sexual Behaviour procedure updated in April 2026.

The NPCC document may support decisions about police involvement, but it must be read alongside KCSIE 2026 and local safeguarding procedures. It must not be used to delay an urgent police or safeguarding referral.