



Bracken Hill School

Child on Child Abuse Policy

Author: Mrs Austin

Policy Type: Whole School

This policy is reviewed annually to ensure compliance with current regulations

The Governors of the school recognise that all staff play a vital role in the achievement of high standards and in providing our pupils with the best opportunities matched to their needs.

Introduction

At Bracken Hill School we have a **zero-tolerance** approach to all forms of child-on-child abuse including sexual violence, sexual harassment (SVSH) and harmful sexual behaviour (HSB). We believe that child-on-child abuse is never acceptable, and it will not be tolerated. It will **never** be passed off as “banter,” “just having a laugh,” “a part of growing up” or “boys being boys.” We will **respond to all signs, reports, and concerns** of child-on-child abuse, including those that have happened outside of our school premises, and/or online. We recognise that children are vulnerable to and capable of abusing their peers, we take such abuse as seriously as abuse perpetrated by an adult. We recognise that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported. We acknowledge that children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable. All alleged perpetrators will be supported with appropriate safeguarding measures, risk assessments, and interventions. Decisions about consequences or reintegration will be made in line with KCSIE 2025 guidance, with consideration for both the welfare of the alleged perpetrator and the wider school community. We are committed to a whole school approach to ensure the prevention, early identification, and appropriate management of child-on-child abuse within our school and beyond.

In cases where child-on-child abuse is suspected or identified we will follow our Child Protection procedures, taking a contextual, trauma-informed, and strengths-based approach to support all children who have been affected by the situation including the victim and **alleged** perpetrator.

Policy Development

This policy is written in line with Keeping Children Safe in Education 2025 and should be read alongside Working Together to Safeguard Children 2023 and local safeguarding partnership procedures. It reflects statutory guidance and statutory duties placed on schools under the Education Act 2002 and Children Act 1989/2004

This policy is available:

- Online via the school website
- From the school office

This policy is reviewed and evaluated throughout the academic year. It is updated annually.

Roles and Responsibilities

All staff working with children maintain an attitude of ‘it could happen here,’ and this is especially important when considering child-on-child abuse. All staff are aware of the safeguarding systems within the school, including reporting procedures and recording systems, and these are explained as part of staff induction.

The Executive Head, Gareth Allen, has overall responsibility for the policy and its implementation and liaising with the Governing body, parents/carers, LA (Local Authority), and outside agencies.

Safeguarding is the responsibility of all however all staff, parents/carers and pupils need to be aware of who to report to and how to report any safeguarding concerns. The Designated Safeguarding Leads (DSL) in our school are:

- Shelley Shelton (Senior Designated Safeguarding Lead)

- Kate Austin (Deputy Designated Safeguarding Lead)
- Richard Jackson (Deputy Designated Safeguarding Lead)
- Sarah Brown (Deputy Designated Safeguarding Lead)
- Nick Goforth (Safeguarding Governor)

The nominated Governor with responsibility for child-on-child abuse will receive termly reports from the DSL, including anonymised trends and patterns of child-on-child abuse, online incidents, and any safeguarding concerns linked to attendance. The Governing Body will ensure that all statutory duties under KCSIE 2025 are met and that safeguarding systems remain effective and up-to-date.

Definitions

- Bullying, including *cyberbullying*, *prejudice-based bullying* and *discriminatory bullying*.
- Abuse in intimate personal relationships between children, sometimes known as *teenage relationship abuse*.
- Physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. This may include an online element which facilitates, threatens, or encourages physical abuse.
- Sexual violence, including rape, assault by penetration, and sexual assault. This may include an online element facilitating, threatening, or encouraging sexual violence.
- Sexual harassment, including sexual comments, remarks, jokes and online sexual harassment, whether standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, for example forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude or semi-nude images/videos, also known as *sexting* or *youth-produced sexual imagery*.
- Upskirting (a criminal offence), involving taking images under a person's clothing without their permission, with the intention of viewing their genitals or buttocks for sexual gratification or to cause distress, humiliation or alarm.
- Initiation/hazing-type violence and rituals, involving harassment, humiliation or abuse as part of group initiation. This may include an online element and can indicate wider exploitation such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) or County Lines.
- Online harms, including harmful *content*, *contact*, *conduct and commerce risks*, as well as misinformation, disinformation and coercive online behaviour that may facilitate abuse. This includes risks linked to artificial intelligence (AI), such as manipulated or synthetic content, impersonation, and the creation of realistic but false images or messages that may be used to facilitate abuse.
- Emotional or coercive control between children, including controlling behaviours, manipulation, intimidation, or patterns of degrading behaviour within friendships or relationships.
- Extra-familial harm, where abuse occurs outside the home environment (e.g., school, online spaces, community settings).
- Increased vulnerability of children with SEND, who may face additional risks due to communication needs, reliance on others for care, challenges recognising abuse, or difficulty reporting concerns.
- The misuse of artificial intelligence (AI) to create, manipulate or share harmful content, including deepfake images or videos, impersonation, or digitally altered material intended to harm, humiliate or coerce others.

Recognising:

At Bracken Hill we recognise that behaviours associated with child-on-child abuse take place on a spectrum. Understanding where a child's behaviour falls on this spectrum is essential to being able to respond appropriately to it.

We recognise that all children grow and develop at their own pace. We will use our professional judgement and knowledge of child development when responding to child-on-child abuse.

Reporting and Responding:

At Bracken Hill we want children, parents/carers, staff and visitors to confidently report abuse, knowing their concerns will be treated seriously. We recognise that our school's initial response to a report of child-on-child abuse is incredibly important—how we respond can encourage or undermine the confidence of future victims to come forward. We will consider and respect the child's wishes and feelings at every stage of the process, ensuring that their voice informs decisions about next steps and the support we offer.

As a school, we will respond robustly to reports of alleged child-on-child abuse, including incidents that have occurred online or outside of school. These reports will be treated with the same seriousness as in-person incidents. We remain committed to supporting and safeguarding all parties involved, including the victim, the alleged perpetrator, and any other child(ren) who may have been affected.

Any incidents involving AI-generated or manipulated content will be treated as safeguarding concerns and managed in line with child protection procedures. This includes the creation, sharing or threat of sharing synthetic or digitally altered content.

We will make decisions on a case-by-case basis, with the Designated Safeguarding Lead (or deputy) taking the leading role and using their professional judgement. Decisions will be supported by other agencies such as the Local Authority, Children's Social Care and the Police, as appropriate, and will be informed by early help and safeguarding thresholds. Staff will not downplay abusive or harmful behaviour. Behaviours such as sexual harassment, derogatory comments, or dismissing concerns as "banter" are unacceptable and will be challenged immediately.

We will ensure that we reference and follow relevant school policies and procedures, including safeguarding, behaviour, online safety, anti-bullying and SEND-related policies. We have clear reporting systems for each group within our school community. The effectiveness of these systems is reviewed throughout the academic year and expanded where necessary to ensure they remain accessible and trusted by all.

Our approach to online safety includes monitoring and managing risks related to content, contact, conduct and commerce. This specifically includes risks from misinformation, disinformation and conspiracy theories, which may cause harm or contribute to abusive behaviours. All reports of online child-on-child abuse will be treated with urgency and seriousness. The school uses the DfE's Plan Technology for Your School guidance to ensure filtering and monitoring systems are appropriate and regularly reviewed.

Children (including bystanders):

It is important to understand that a victim may not always find it easy to tell staff about their abuse verbally. Children may show signs or behave in ways they hope adults will notice. In some cases, the victim may not make a direct report, and another child may report on their behalf. Children may also not recognise that they are being abused or may minimise what has happened. All children will be supported to understand how to report concerns or incidents of child-on-child abuse.

We ask that all children report any concerning behaviour to a member of school staff. This may be any trusted adult including a class teacher, teaching assistant, lunchtime supervisor, the Headteacher, or office staff. We regularly discuss trusted adults in class and assemblies to ensure children know who they can go to for help.

The member of staff receiving the concern will listen carefully, take the concern seriously, and make an initial note. They will explain next steps to the child in an age-appropriate way and reassure them that they will be supported. In line with Keeping Children Safe in Education 2025, staff will never promise confidentiality, as sharing information may be necessary to safeguard the child.

A formal record of the concern will be made on MyConcern, and relevant staff will be alerted. If the report is urgent or indicates a child may be at risk, the staff member will immediately inform the Designated Safeguarding Lead.

We recognise that some children—particularly those with SEND—may find it difficult to report verbally. We therefore provide additional reporting mechanisms including support for alternative communication methods such as drawings, symbols, AAC devices, or communication books. Staff remain alert to non-verbal cues, behaviour changes, or distress that may indicate a safeguarding concern.

Staff will also challenge all harmful or inappropriate behaviours between children.

Minimising or dismissing behaviour as “banter”, “just having a laugh”, or “part of growing up” is unacceptable and can contribute to a culture where abuse is normalised.

Persistent absence or unexplained non-attendance may indicate abuse or safeguarding concerns. Staff will escalate attendance concerns to the DSL in line with school safeguarding procedures.

Parents/carers

We understand that parents and carers may find it difficult and distressing to make or receive a report that their child has been the victim of, or is alleged to have perpetrated, child-on-child abuse. We recognise that families may need support and reassurance during this process.

In line with Keeping Children Safe in Education 2025 (Part 5), the school will seek advice and support from other agencies on a case-by-case basis. All decisions made by the school will reflect the needs of the individual children involved, the wider school community, and the statutory safeguarding thresholds.

Parents/carers who have concerns about their child experiencing or allegedly perpetrating child-on-child abuse are asked to contact the Designated Safeguarding Lead (DSL) or Deputy DSL directly (in person, by phone, or via email). The DSL/Deputy DSL will take an initial note

of concerns and may arrange a meeting to ensure adequate time to explore the situation in detail. Following this, a formal record of the report will be made on the school's safeguarding recording system MyConcern, and any relevant staff will be alerted.

If the concern is urgent, or if a child is considered at risk, the DSL/Deputy DSL will seek advice from statutory services such as Children's Social Care or the Police. We ask parents/carers to raise concerns directly with the school rather than discussing them with other members of the school community in person or online. This helps protect confidentiality and avoids misinformation spreading.

The school remains committed to supporting all pupils and families involved in any instance of child-on-child abuse. We will keep all parties informed of progress where appropriate; however, we must also follow GDPR requirements and respect any restrictions linked to statutory investigations. This may mean that at times, the school is unable to share specific details.

In line with statutory guidance, the school will not minimise or downplay harmful behaviour, and staff will challenge dismissive attitudes (e.g., framing behaviour as "banter" or "part of growing up"), as this can contribute to unsafe cultures. If a parent/carer is dissatisfied with the school's actions or decisions, they may follow the school's Complaints Policy and procedures, available on the school website and from the school office.

Staff

Our staff work closely with our children and may notice changes in behaviour, presentation, or attitude that indicate something is wrong before a report is made by a child or a member of the school community. Staff understand that children may not always verbalise concerns, and that behaviours may indicate that a child has been the victim of, or is displaying, child-on-child abusive behaviours. This includes the possibility that children with SEND may communicate distress or safeguarding concerns differently.

Staff will be aware of emerging risks, including the use of artificial intelligence (AI) in facilitating child-on-child abuse, and will respond to such concerns in line with safeguarding procedures.

In line with Keeping Children Safe in Education 2025, if staff have any concerns about a child's welfare, they must act immediately rather than waiting to be told or assuming someone else will take action. Staff must also challenge all inappropriate or harmful behaviours and avoid normalising or downplaying concerns (e.g., referring to sexual harassment or abuse as "banter" or "just part of growing up").

Staff should report any concerns directly to a Designated Safeguarding Lead (DSL) or to the Headteacher. The member of staff receiving the concern will listen carefully, make an initial note of the information shared, and ask the staff member to create a formal safeguarding record using the school's electronic recording system, MyConcern. Relevant staff members will be alerted as necessary.

If a report is urgent or indicates that a pupil may be at risk, the DSL or Deputy DSL will seek advice from statutory services such as Children's Social Care or the Police, in line with safeguarding thresholds and multi-agency guidance.

Visitors

We ensure that all visitors to our school are made aware of our Child Protection and Safeguarding procedures, including who they should report any concerns to. The appropriate safeguarding contact may differ depending on the nature of the visit (e.g., supply teachers, governors, external agency staff), but visitors will always be informed of how to raise concerns on arrival. In line with Keeping Children Safe in Education 2025, all adults on site are expected to act immediately if they have concerns about a child's welfare.

If a visitor witnesses, suspects, or is told about any form of child-on-child abuse, they must report any safeguarding concerns immediately and in person to the Designated Safeguarding Lead (DSL), or one of the Deputy DSL's. They will also be asked to complete a paper safeguarding concern form. The DSL will then ensure that this is recorded on the child's formal safeguarding record within the school's secure recording system, MyConcern. Relevant staff will be alerted as appropriate to ensure a timely and coordinated response. Where a concern is urgent, or there is reason to believe that a child may be at risk of harm, the DSL or Deputy DSL will take immediate action and seek advice from statutory services, including Children's Social Care or the Police.

Visitors must report concerns before leaving the school site and never wait until the following day, and written notes left without speaking to a staff member are not acceptable. This reflects the statutory expectation that concerns must never be ignored, downplayed, or delayed.

Visitors are also expected to challenge any inappropriate or harmful behaviours they witness, as minimising or dismissing such behaviour—as “banter,” “having a laugh,” or “part of growing up”—can contribute to unsafe cultures.

Where pupils attend alternative provision or external settings, the school will ensure that appropriate safeguarding measures are in place. This includes checks on the suitability of providers, ensuring staff are trained appropriately, confirming that safeguarding policies align with statutory expectations, and establishing clear reporting lines back to the school's DSL. Keeping Children Safe in Education 2025 reinforces the need for oversight, regular review of placements, and written confirmation of safeguarding checks for alternative provision staff.

Recording and evaluating:

We will ensure a written report is made as soon after the disclosure as possible, recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated. We will ensure the Designated Safeguarding Lead (or deputy) will be informed as soon as possible, if they were not involved in the initial report. This information should be recorded on MyConcern. We will ensure that details of decisions made and reasons for decisions are recorded as well as any outcomes.

We will ensure that any Behaviour and Risk Management Plans are recorded, saved on the school's system and kept under review.

The school recognises the importance of identifying and responding to low-level concerns. These will be recorded and reviewed alongside other safeguarding information to enable early intervention, identify patterns of behaviour, and prevent escalation into more serious harm.

Strategies for Prevention:

Staff

Our staff understand that child-on-child abuse may be happening even if it is not being reported. They are trained to identify early signs, respond immediately to concerns, and challenge any behaviour or attitudes that normalise or minimise abuse. This includes:

- Challenging physical behaviours (including those that may be criminal), such as grabbing bottoms, breasts, and genitalia; pulling down trousers; flicking bras; and lifting skirts.
- Challenging the attitudes that underpin such behaviours both inside and outside the classroom (e.g., dismissing actions as “banter,” “just a laugh,” or “part of growing up”).
- Ensuring that the Governing Body, proprietors and/or management committee understand and fulfil their statutory safeguarding responsibilities, including having effective child protection and child-on-child abuse policies in place.
- Ensuring that all child-on-child abuse concerns are passed to the Designated Safeguarding Lead (DSL) and safeguarding team so they can identify trends, monitor emerging risks, and put support in place for children who may be particularly vulnerable.

Information for Children

- We are committed to creating an ethos in which all children feel able to share concerns in a safe, non-judgemental environment. This includes:
- Creating a culture where children feel safe to report concerns, confident they will be taken seriously, and know they will be supported.
- Regularly teaching all children what to do if they witness or experience child-on-child abuse, the impact it can have, and why abusive behaviour happens.
- Ensuring children understand the school’s zero-tolerance approach to all forms of child-on-child abuse, how to report concerns, and where they can access help, support and advice.
- Providing ongoing education about the nature and prevalence of child-on-child abuse through RHE/RSHE, PSHE, and the wider curriculum.
- Challenging the attitudes that underlie child-on-child abuse during lessons, pastoral work, assemblies, and informal interactions.

Information for Parents/Carers

- We aim to build strong partnerships with parents and carers so that concerns can be identified and addressed early. This includes:
- Talking to parents in groups and one-to-one about safeguarding expectations and how the school prevents and responds to child-on-child abuse.
- Offering support through our Community Liaison Officer (where applicable).
- Inviting parents to contribute to the review of relevant policies, curriculum content, and lesson plans.
- Encouraging parents to hold the school to account for its safeguarding practice.
- Asking parents what they see as the key risks facing their child, and how they feel the school should address them.
- Working with parents to challenge attitudes that contribute to child-on-child abuse in school and in the wider community.
- Ensuring parents understand the school’s safeguarding culture and expectations.

RHE (Relationships & Health Education) / RSHE Curriculum

- Our school has clear values and standards that are upheld across all aspects of school life and supported by a planned, evidence-based RSHE curriculum. This includes:
- Delivering a PSHE/RSHE programme that is inclusive, age-appropriate and responsive to the needs of all pupils, including those with SEND or additional vulnerabilities.
- Teaching pupils about:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Equality, stereotyping and prejudice
 - Body confidence and self-esteem
 - Recognising abusive relationships, including coercive and controlling behaviour
 - The concepts of, and laws relating to:
 - Sexual consent
 - Sexual exploitation
 - Abuse
 - Grooming
 - Coercion
 - Harassment
 - Rape
 - Sexual violence and sexual harassment
 - Teenage relationship abuse (intimate personal relationships between children)
 - How to access support
 - What constitutes sexual harassment and sexual violence and why these are always unacceptable.
 - Pupils will be supported, at an appropriate level, to understand that online content may be manipulated or generated using artificial intelligence (AI), and how this can be used to harm others.

Breaches / Complaints:

Breaches of this policy will be addressed in the same way as breaches of other school policies, as determined by the Headteacher and the Governing Body. As required by Keeping Children Safe in Education 2025, the Governing Body is responsible for ensuring that safeguarding policies are effectively implemented and that staff understand and follow them.

Any failure to follow this policy, or any behaviour that undermines the school's safeguarding culture, will be taken seriously and dealt with in line with the school's disciplinary procedures.

If a parent or carer is dissatisfied with the school's actions or decisions, they may follow the school's Complaints Policy and procedures. This is available on the school website and from the school office on request. Parents and carers are encouraged to raise concerns directly with the school so that issues can be addressed promptly and appropriately, in line with wider safeguarding expectations around engaging and supporting families.

Links with other policies:

You may find it helpful to read this child-on-child abuse policy alongside the other following school policies:

Policy	How it may link
Safeguarding Policy	Includes information about child protection procedures and contextualised safeguarding
Behaviour Policy	Includes details about the school's behaviour system including potential sanctions for pupils
Anti-Bullying policy	Includes information about bullying behaviours and vulnerable groups
Online Safety / Acceptable Use Policies	Includes information about children's online behaviour and details about online bullying/cyberbullying
Equalities Policy	Includes information about our school's approach to tackling prejudice and celebrating differences. Links to prejudice-related language and crime and the protected characteristics
RSHE / PSHE Policy	Includes information about our school's RSHE programme and how we teach about healthy relationships, friendships, and bullying
Complaints Policy	Includes information about how to make a complaint if you are not satisfied with the school's response

Further information and support can be found through the following links:

Part 5: Child-on-child sexual violence and sexual harassment (KCSIE 2025)

https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf

• **Keeping Children Safe in Education 2025 – Definitions & Guidance**

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

• **NSPCC – Hackett's Continuum Model of Sexual Behaviours**

<https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour/understanding>

• **NSPCC – Understanding Sexualised Behaviour in Children (video series)**

https://www.youtube.com/playlist?list=PL_r_2Fqw0_0Wx4Yz0y_VIHmmTEVMMXqWR

Monitoring and Review

This policy is reviewed and evaluated throughout the academic year. This policy replaces previous versions and reflects Keeping Children Safe in Education 2025. It will be reviewed annually or sooner in line with statutory updates, changes in local procedures, or following an incident.

Version control and approval dates are recorded at the front of the policy.

Date approved by the Governing Body:

Date to be reviewed: January 2027