



Child on Child Abuse and Harmful Sexual Behaviour Policy

Policy Overview

Reviewed by	Carl Braithwaite
Date for Review	September 2026
Approving Body	The Strategic Development Committee
Signed Chair of Trustees	S. Trentini



1.Introduction

In all Forge academies and schools, we recognise that children can abuse other children and that this can happen inside or outside our school and online. Child-on-child abuse will be taken seriously and responded to as a safeguarding concern. We maintain an attitude of “**it could happen here**”, even where no incidents have been reported. Abuse will not be tolerated or dismissed as banter, having a laugh, part of growing up or boys being boys. We will respond in a way that:

- prioritises the safety and best interests of all children involved
- considers the child’s wishes, feelings and lived experience
- reflects the children’s ages, developmental stages, needs and vulnerabilities
- considers any power imbalance, coercion, discrimination or wider peer-group context
- provides appropriate support alongside any disciplinary response
- involves safeguarding partners and specialist services where required

2. Forms of Child-on-Child Abuse

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

- bullying, including cyberbullying and prejudice-based or discriminatory bullying
- physical abuse
- emotional or psychological abuse
- controlling or coercive behaviour within peer or intimate relationships
- abuse connected to prejudice, misogyny, misandry or harmful attitudes
- initiation or hazing-type violence and rituals
- online abuse, harassment, impersonation or manipulation
- the use of technology or generative AI to create, alter or distribute harmful material
- abuse involving threats, intimidation, exploitation or serious violence
- sexual harassment, sexual abuse or sexual violence

Abuse may be carried out by an individual or a group and may affect children of any age or background. It may occur face to face, online or through a combination of both. Children who cause harm may also have unmet needs or be experiencing abuse, neglect, exploitation or trauma themselves.

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.

3. Harmful Sexual Behaviour

Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour must be considered within its context. We will consider:

- the age and developmental stage of each child
- the nature, frequency and seriousness of the behaviour
- whether there is coercion, intimidation or a power imbalance
- the effect on the child who has experienced the behaviour
- whether the behaviour is repeated or escalating
- any SEND, communication needs, trauma or other vulnerabilities
- the online and offline context
- whether other children may be at risk



- whether the behaviour indicates wider safeguarding concerns

Staff must not attempt to make specialist assessments outside their role. Concerns must be reported to the DSL so that appropriate advice, assessment and support can be obtained.

Further information: [Sexual Behaviour and Development in Children](#), [Responding to Children who Display Sexualised Behaviour](#) and [HSB Toolkit](#)

4. Sexual Harassment and Sexual Violence

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school. In this context it specifically relates to child-on-child sexual harassment. This includes (but not limited to):

- sexual comments, sexual stories, sexual jokes
- sexual remarks about clothing or appearance
- physical behaviour
- displaying pictures, photos or drawing of a sexual nature
- upskirting
- online sexual harassment; making and sharing of nudes or semi-nudes, sharing of unwanted explicit content, sexualised online bullying, unwanted sexual comments online, sexual exploitation, coercing others into sharing images of performing acts they're not comfortable with

Sexual Violence refers to specific sexual offences under the Sexual Offences Act 2003. This includes:

- Rape
- Assault by penetration
- Sexual assault
- Sexual activity without consent

Our school recognises that a child under the age of 13 cannot consent to any sexual activity, the age of consent is 16 and sexual intercourse without consent is rape.

Further information: [Rape Crisis England & Wales](#)

5. Nudes and Semi-Nudes

Nudes and Semi-Nudes refers to the creation, sending or posting of nude or semi-nude images by children. The term 'images' includes all visual content, such as photographs, videos and livestreams. The term 'nudes' is used as it is the most widely understood term by young people and best captures the full range of image-sharing behaviours that the policy aims to address.

Images may be taken by children themselves or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including those described as 'deepfakes' or 'deep nudes.'

Further information: [UKCIS Sharing nudes and semi-nudes: Advice for education settings](#)

6. Prevention and Education

We seek to prevent child-on-child abuse through clear behaviour expectations, accessible reporting systems, appropriate supervision, staff training and planned safeguarding education.

Children will be taught that abuse, harassment, discrimination and violence are unacceptable and how to recognise unsafe behaviour and seek help. Teaching will be age-appropriate, accessible and adapted where necessary.



Strategies for Prevention

Staff training – including for supply staff, Trustees, volunteers, and visitors: -

- Contextual safeguarding
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Challenging the attitudes that underlie abuse (both inside and outside of school)
- Ensuring that all child-on-child abuse issues are fed back to the safeguarding lead/team so that they can spot and address any concerning trends and identify those children who may need additional support.

- **Information for children (pupils/students)**

- Creating an ethos and culture in which all children feel able to share their concerns openly, in a non-judgemental environment, and have them listened to
- All children are frequently told what to do if they witness or experience any form of child-on-child abuse, the effect that it can have on those who experience it and the possible reasons for it.
- They are regularly informed about the school's approach to all forms of child-on-child abuse, including the academy's zero-tolerance approach towards all forms of child-on-child abuse, the process for reporting their concerns of child-on-child abuse and where to go for further help, support, and advice.
- Educating all children about the nature and prevalence of child-on-child abuse via a well embedded RHE/RSHE curriculum, PSHE curriculum or wider curriculum
- Challenging the attitudes that underlie such abuse (both inside and outside of the classroom).

- **Information for parents/carers** - give specific details on engagement with parents/carers

- Talking to parents, both in groups and one-to-one
- Providing opportunities for parents to be involved in the review of academy policies and lesson plans; and
- Encouraging parents to hold the school to account on this issue.
- Asking parents what they perceive to be the risks facing their child and how they would like to see the academy address those risks.
- Challenging the attitudes that underlie child-on-child abuse – in academy and/or the wider community.
- Ensuring parents /carers are aware of the ethos and culture of the academy.

6.RSHE Curriculum

The academy has a clear set of values and standards, upheld, and demonstrated throughout all aspects of academy life, which is supported by a planned programme of evidence based RSHE curriculum.

Our/RSHE/PSHE programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering children with SEND (Special Educational Needs and Disabilities) and/or other vulnerabilities)

We will, through our RSHE/PSHE programme promote:

- Healthy and respectful relationships



- Boundaries and consent
- Equality and raise awareness of stereotyping and prejudice.
- Body confidence and self-esteem.
- How to recognise an abusive relationship, including coercive and controlling behaviour.
- The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, teenage relationship abuse (intimate personal relationships between children), and how to access support, and
- What constitutes sexual harassment and sexual violence and why these are always unacceptable.

Further support: [KCSIE 2026, Annex A](#)

7. Reporting Child-On-Child Abuse and Harmful Sexual Behaviour

All concerns about child-on-child abuse and HSB must be reported to the DSL or a deputy without delay and recorded through our safeguarding procedures.

Staff must follow Section D of the Whole School Child Protection Policy (See appendix one): Responding to a Disclosure, Reporting Safeguarding Concerns and Recording Concerns, Decisions and Actions. They must not investigate the concern or intentionally view, copy, print, save, forward or ask a child to share harmful digital material.

The absence of the DSL or a deputy must not delay protective action. Any member of staff may make a direct referral to children's social care or contact the police where necessary.

8. Initial Safeguarding Response

On receiving a report, our school and DSL will consider:

- the immediate safety and welfare of all children involved
- the child's wishes and feelings
- whether medical assistance or emergency protection is required
- whether other children may be at risk
- the need to preserve evidence
- whether parents or carers should be informed
- whether the concern can be managed within our school based on the incident and information
- whether Early Help, Family Help or specialist support is required
- whether a referral to children's social care or the police is required
- whether advice is needed from another safeguarding or specialist service

The DSL will engage with local processes as necessary. In cases of sexual violence, our school will not manage this independently and internally, and local procedures require our school to report the incident to children's social care and the police. General referral thresholds and support pathways are set out in Section D: Immediate Danger and Referrals and Section E: Continuum of Help and Protection.

We will not conduct a criminal investigation. Where children's social care or police are involved, our school will agree how its safeguarding and disciplinary processes should proceed without prejudicing external enquiries.

9. Risk and Needs Assessment

Where appropriate, our school and DSL will arrange and record an initial risk and needs assessment. This should



consider:

- the safety and needs of the child who has experienced harm
- the needs and circumstances of the child alleged to have caused harm
- the safety of other children, including siblings, friends and witnesses
- shared lessons, activities, spaces, transport and social times
- online contact and social-media activity
- the likelihood of repetition, retaliation, bullying or wider peer-group harm
- any environmental or contextual risks
- the actions required to reduce risk and provide support

In cases of sexual violence, a professional risk assessment by a social worker or sexual violence specialist is to be required. Our school's risk assessment is not intended to replace the detailed assessments of expert professionals. Professional assessments should be used to inform the school or college approach to supporting and protecting their pupils and students and updating their own risk assessment.

The assessment must be reviewed when new information emerges, circumstances change or agreed actions are not reducing risk.

Contextual and extra-familial risks must also be considered in accordance with Section G.

10. Support

Children who report or experience abuse will be listened to, taken seriously and supported. Support may include:

- an identified trusted adult
- a safety or support plan
- adjustments to lessons, timetables, transport or shared spaces
- pastoral, therapeutic or specialist support
- regular review and check-ins
- support with attendance, learning and wellbeing
- action to address bullying, retaliation or online fallout
- liaison with parents, carers and external services where appropriate

The child should not be made to feel responsible for the disruption caused by safeguarding arrangements. Changes should be proportionate, carefully planned and reviewed with the child's needs and wishes in mind.

Children alleged to have caused harm will also receive an appropriate safeguarding response. This may include:

- assessment of their needs and circumstances
- education and support to understand the impact of their behaviour
- pastoral or specialist intervention
- safeguarding or family support
- proportionate disciplinary action
- referral to statutory or specialist services where required

Support does not prevent our school from applying its behaviour policy. Safeguarding action and disciplinary action may take place alongside each other, provided that both are fair, proportionate and coordinated with any external



investigation.

Other children who have witnessed, supported, shared information about or otherwise been affected by an incident will also be considered and offered appropriate support.

It is important to understand that a victim may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. We recognise that in some instances another child may report on another child's behalf. All children will know 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 can be any member of teaching or non-teaching staff, including a class teacher, a TA, the Principal, a lunchtime supervisor, or a member of the office team. We talk about trusted adults regularly in class and in assemblies to remind our children of who they can report concerns to.

The member of staff will listen to the child and make an initial note of their concerns, they will then discuss next steps with them and reassure them that they will be supported. In line with the statutory guidance provided in Keeping Children Safe in Education 2026, we will never promise a child confidentiality (see appendix 1).

We understand that some children may find it difficult to tell a member of staff about their concerns verbally, we therefore have additional reporting mechanisms in place. All academies have a worry box in each classroom where the child can put their name/a brief note about their concerns/draw a picture of their concern – these worry boxes are introduced to the children at the start of the year and children are reminded of them regularly. Our academies also have an online Worry Monster- if a child feels unable to tell a member of staff about their concerns verbally, they could send a message with their concerns, and these will be followed-up/responded to by the academy's Designated Safeguarding Lead or Deputy.

11. Parents and Carers

Parents and carers will usually be informed and involved in planning support for their child. The DSL will consider communication separately for each child involved.

Parents or carers will not be informed where doing so may increase risk, prejudice an external enquiry, lead to the loss of evidence or otherwise be contrary to the child's best interests. Where statutory or specialist services are involved, communication with families will be agreed with them.

We ask that if parents/carers have concerns about a child experiencing or allegedly perpetrating child-on-child abuse, that they contact the academy's Designated Safeguarding Lead/Deputy (in person/via telephone call/via email) to explain their concerns.

The Designated Safeguarding Lead/Deputy will take an initial note of the concerns but may ask to schedule a meeting to allow for more time to discuss the concerns in detail. Following the report and/or the meeting, the Designated Safeguarding Lead/Deputy will make respond in line with our outlined procedures (see sections 7 and 8 above).

We ask that parents/carers to come directly to the academy with their concerns rather than discussing them with other members of the academy community in person or online.

Our academy remains committed to supporting pupils and their families in all instances of child-on-child abuse. We will endeavour to ensure that all parties are kept informed of progress and any developments, but we will also need to



show due regard to GDPR (General Data Protection Regulations) and ongoing investigations by statutory services. This may mean, at times, that we are not able to provide or share information or updates.

If a parent/carer is not satisfied with our academy's actions, we ask that they follow our school's complaint policy and procedures. This is available online from our academy website and on request from the main office.

12. Recording and Confidentiality

All concerns, decisions, referrals, assessments, support and outcomes must be recorded in accordance with Section D (see Whole School Child Protection Policy - see appendix one): Recording Concerns, Decisions and Actions and Confidentiality and Information Sharing.

Information will be shared only with those who need it to safeguard or support the children involved. Staff, children and families must respect confidentiality and must not discuss or share information through social media.

13. Review and Learning

The DSL and senior leaders will review significant incidents and patterns to identify any required changes to policies, staff training, behaviour expectations, reporting systems, curriculum, supervision, online safety or pastoral support.

The governing body or proprietor will receive appropriate assurance while respecting the confidentiality and privacy of the children involved.

14. 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.

The Principal, has overall responsibility for the policy and its implementation and liaising with the Trustee Board, 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.

Staff

Our staff work closely with our children and therefore may notice a change in a child's behaviour or attitude that might indicate that something is wrong before receiving a report from a child or a member of the academy community. If staff have any concerns about a child's welfare or are concerned that a child is displaying behaviours that may show they have been the victim of or that they are perpetrating child-on-child abuse, they should act on them immediately rather than wait to be told.

We ask that staff report their concerns to the Designated Safeguarding Lead.

7.Breaches / Complaints

Breaches to this policy will be dealt with in the same way that breaches of other academy policies are dealt with, as determined by the Principal and Trustee Board.

If a parent/carer is not satisfied with our academy's actions, we ask that they follow our Trust's complaint policy and procedures. This is available online from our academy website, and on request from the academy office.



8.Links with other policies

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

Policy	How it may link
Whole School Child Protection Policy	Includes information about child protection procedures and contextualised safeguarding
Behaviour Policy	Includes details about the academy's behaviour system including potential sanctions for pupils
Anti-Bullying policy	Includes information about bullying behaviours and vulnerable groups
Online Safety / E-Safety / Acceptable Use Policies	Includes information about children's online behaviour and details about online bullying/cyberbullying
Equalities Policy	Includes information about our academy'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 academy's response

9.Monitoring and Review

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



Appendix One

Section D - Recognising, Reporting and Recording Concerns

At academies within the Forge Trust, staff must report safeguarding concerns without delay, even where information is limited or they are uncertain whether harm has occurred.

Staff should be alert to changes in a child's behaviour, presentation, wellbeing, attendance, relationships, progress, health, online activity or wider circumstances. Concerns may arise within or outside the family, within peer groups, in the community or online, and different forms of harm may overlap.

Staff must remain professionally curious and avoid assumptions based on a child's characteristics, needs or behaviour.

Responding to a Disclosure

If a child shares a concern or discloses abuse, neglect or exploitation, staff should:

- listen calmly, give the child their full attention and allow them to speak at their own pace
- use open prompts only where clarification is necessary and avoid leading, investigative or repeated questions
- reassure the child that they have done the right thing and explain that information must be shared with those who can help
- never promise confidentiality, make judgements or confront the person alleged to have caused harm
- not ask the child to write a statement, sign notes or repeat their account unnecessarily
- record the child's words, wishes and feelings as accurately as possible
- report the concern to the DSL or a deputy immediately

Staff must not investigate the concern themselves or confront the person alleged to have caused harm.

Where a concern involves nudes or semi-nudes, including AI-generated or altered imagery, staff must not intentionally view, copy, print, forward, save or ask the child to share the imagery. The concern must be reported to the DSL immediately. Where a concern involves harmful digital material, staff must also follow Section H: Reporting Child-on-Child Abuse and Harmful Sexual Behaviour.

Further information about recognising abuse, neglect and exploitation is available in [What to do if you're worried a child is being abused: advice for practitioners](#) and through the [NSPCC](#).



Reporting Safeguarding Concerns

Staff must report concerns to the DSL or a deputy without delay using the school's agreed procedure:

An electronic or written record does not replace the need to speak directly to the DSL or a deputy where a concern is urgent.

If the DSL is unavailable, staff must follow Section C: Deputy DSLs and Safeguarding Cover. The absence of the DSL or a deputy must not delay action.

Any member of staff may make a direct referral to children's social care where necessary. Staff should inform the DSL as soon as possible after making a direct referral, unless there is a valid reason not to do so.

Immediate Danger and Referrals

Where a child is in immediate danger or requires urgent protection, staff must contact the police on **999** and make an immediate referral to children's social care where appropriate.

Where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, a referral must be made to Nottinghamshire MASH without delay.

A Family Help assessment is not required before making a referral. Seeking advice, consulting the DSL or attempting to obtain consent must not delay protective action.

The available support and statutory pathways are explained in Section E: Continuum of Help and Protection.

Recording Concerns, Decisions and Actions

All safeguarding concerns, discussions, decisions, actions and outcomes must be recorded promptly. Records should include:

- the child's identifying details and the date, time and context of the concern
- a clear and factual account, including the child's own words, wishes and feelings where possible
- relevant observations, including the location and appearance of any injury
- the name and role of the person making the record
- when and to whom the concern was reported
- advice received, action taken and decisions made
- the outcome and arrangements for follow-up or support

Records should distinguish between fact, observation, professional opinion and information provided by another person.

Staff must not photograph a child's injury, mark or physical indicator for safeguarding-recording purposes. A body map must be used only to record the location and observable appearance of an injury. Staff must not attempt to diagnose the injury, estimate its age or speculate about how it occurred. Photographs required for evidential, forensic or medical purposes should normally be taken by appropriately trained police, medical or other authorised professionals. Child protection records must be confidential, securely stored and kept separately from the main pupil or student record. Access should be restricted to those who need the information to safeguard or support the child.



Confidentiality and Information Sharing

Staff must maintain appropriate confidentiality but must never promise to keep safeguarding information secret.

Timely information sharing is essential to identifying need, assessing risk and protecting children. Staff must not assume that another person or agency will share information that may be critical to keeping a child safe.

Information will be shared lawfully, promptly and proportionately where necessary to safeguard or promote a child's welfare. Consent is not always required where another lawful basis applies, and data protection law must not prevent or delay safeguarding action.

Where safe and appropriate, children and parents or carers will be informed about what information will be shared, with whom and why. Information may be shared without their knowledge or consent where seeking consent could increase risk, prejudice an investigation or cause unjustified delay.

Decisions to share or withhold information and the reasons for them will be recorded.

Consent for Early Help and Family Help is addressed in Section E: Consent and Working with Families.

Further guidance: [Information sharing advice for practitioners](#) and [Data Protection in schools](#)

Referral Feedback and Escalation

Children's social care should acknowledge a referral and decide the next course of action within one working day. **The referrer should follow up if appropriate feedback is not received.**

Where the response does not address the concern, or the child's circumstances are not improving, we will use [Nottinghamshire's professional challenge and escalation procedures](#). Staff must continue to report new information while awaiting a response.

Referral to another agency does not end our responsibility to safeguard and support the child.

Transfer of Child Protection Records

When a child moves school or college, the DSL will transfer the child protection file securely and separately from the main pupil record within five days of an in-year transfer or; within the first five days of a new term.

Confirmation of receipt must be obtained. Relevant safeguarding and risk information will be shared in advance where necessary to enable the receiving school to assess risk and arrange support.

We will retain a record of the transfer in accordance with our retention procedures.

Support Following a Safeguarding Concern

We recognise that disclosures and safeguarding processes may be distressing. We will consider appropriate pastoral, therapeutic or specialist support, safety planning, reasonable adjustments and staff wellbeing support according to individual need.

Support will be reviewed as circumstances change and will not replace any required referral, investigation or protective action.



