

Child on Child Abuse Policy

This policy is currently in draft form and is scheduled for formal ratification by the Board in December.

Document Control	
Manager Responsible	M Williams, Safeguarding & Prevent Manager
Version Number	5
Approved By	Board
Approval Date	December 25
Review Date	November 2027

Accessibility Statement - If you have any learning difficulty, disability or health problem, that means you are unable to follow the policy in the way laid out in this document, or you may require additional support to help you with the process, please inform your tutor (students) or personnel (staff).

Contents

1. Introduction.....	3
i. Principles.....	4
ii. Purpose	5
iii. What is Child on child Abuse	5
iv. Types of abuse.....	6
v. Serious crime.....	7
vi. Bullying (inclusive of all types).....	8
vii. Cyber bullying	8
viii. Sexting (Youth Produced Imagery)	8
ix. Upskirting.....	8
x. Prejudiced Behaviour.....	9
xi. Relationship abuse	9
xii. Frivolous or vexatious complaints	9
2. Measuring the behaviour	9
i. The Context.....	9
3. Procedure for responding to a report.....	10
The immediate response to a report	10
When recording behaviour, it is essential to	11
4. When should the college seek support from external agencies?.....	12
i. Reporting to the Police.....	13
ii. Multi-agency working	14
5. Legislation, guidance and Law to be taken into consideration when applying this policy	15
Appendix 1	17
Appendix 2	18
Appendix 3	19

1. Introduction

Keeping Children Safe in Education requires Governing bodies to guarantee there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare. The college requires an effective child protection policy which:

- should describe procedures which are in accordance with government guidance
- refer to locally agreed multi-agency safeguarding arrangements.

Hereford College of Arts' (HCA) child protection policies include:

- Safeguarding and Child Protection Policy and Procedure
- Harassment, Bullying and Sexual Misconduct Student Policy
- IT acceptable Use Policy
- Child on child Abuse Policy

The Child on child Abuse Policy must be followed by staff handling alleged abuse between HCA students who are children (all those young people under the age of 18) and vulnerable adults. It should also be followed in the event of child on child abuse where the alleged perpetrator is not a student at HCA but is under 18 years old or a vulnerable adult.

Whilst the College's response to child on child abuse will be in many ways similar for students of any age there are some additional considerations in relation to a student under 18, for example how local agencies and/or partners respond. Similarly, the College's response to incidents involving the exchange of youth produced sexual imagery will need to differ depending on the age of the students involved.

For the purposes of the policy children is used to refer to all young people under 18.

To aid the understanding of the use of the word vulnerable within this policy, see the following definitions below from the Government Office for Health Improvement and Disparities – "Vulnerabilities: applying to All our Health" (March 2022).

- Vulnerability:
Being vulnerable is defined as in need of special care, support, or protection because of age, disability, risk of abuse or neglect.
- Childhood vulnerability:
There is no commonly used definition of childhood vulnerability. A child can be vulnerable to risks and poor outcomes due to individual characteristics, the impact of action or inaction by other people and their physical and social environment.
- Vulnerable adults:
The NHS defines vulnerable adults as any adult (person over the age of 18) unable to take care of themselves or protect themselves from exploitation.
Many factors can influence adult vulnerability, experiences of vulnerability in childhood may negatively impact adults in later life – particularly if someone has fewer protective factors in place, such as a supportive family or a stable household income.

- **Vulnerable background:**
Children and young people's physical, emotional and mental wellbeing are significantly shaped by the social determinants of health into which they are born, live, learn and grow. Traumatic events and adverse circumstances occurring in childhood are associated with long-term impact on outcomes at population level. This does not mean that every child experiencing trauma and adversity will experience poorer outcomes. Multiple factors influence outcomes – the presence of protective factors such as a supportive family will also be key influences

Questions about definition should never hinder a staff member from seeking advice on Child on child abuse from the College's Designated Safeguarding Lead or Deputy Safeguarding Leads.

i. Principles

HCA's governors and staff are committed to the prevention, early identification, early intervention and appropriate management of child on child abuse (as defined below).

HCA are committed to ensuring that any form of abuse and or harmful behaviours are dealt with in a timely manner and consistently, in order to reduce the extent of harm to the recipient and child responsible for harm.

HCA will ensure that full consideration is given to the emotional and mental health and wellbeing of all parties involved

HCA recognises that even if incidents are not being reported, it should never be assumed that child on child is abuse is not happening.

KCSIE 2025 (Part five) states that: "All staff working with children are advised to maintain an attitude of '**it could happen here**', and this is especially important when considering child on child abuse."

Staff understand the importance of challenging inappropriate behaviours between students and not to downplay them or dismiss them as "banter" or "part of growing up".

HCA recognises the importance of working with parents and carers. If a student is feeling unsafe as a result of the behaviour of any of their peers, they should inform the College so that it can ensure that appropriate and prompt action is taken in response.

All HCA staff have training across the safeguarding issues and behaviours that can put children at risk of harm.

HCA staff are aware that many safeguarding issues can manifest themselves via child on child, that a child causing harm may themselves be vulnerable.

ii. Purpose

The purpose of this policy is to explore the many forms of child on child abuse and include a planned and supportive response to concerns and incidents, to help keep our students safe, ensure they are listened to and that all reports taken seriously.

This policy should be read in conjunction with other HCA policies to include:

- Safeguarding and Child Protection Policy and Procedure
- Harassment, Bullying and Sexual Misconduct Student Policy
- FE Behaviour Policy
- FE Support and Challenge Policy
- Acceptable Use Policy
- E-Safety Policy
- Suicide Safer Policy

This policy has been produced to support the key principles of the Children's Act 1989 and Keeping Children Safe in Education (KCSIE) 2025 in that the child's welfare is paramount and that procedures should be put in place to ensure that the voice of the child is heard and that any contextual safeguarding issues be considered.

iii. What is Child on child Abuse

For the purposes of this policy, child on child abuse is described as any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, young people and adults within relationships (both intimate and non-intimate).

It must be remembered that abuse and violence are rarely isolated events and can often be linked to other incidents that are occurring in the recipient's lives. Therefore, any response to child on child abuse should consider the range of possible types of child on child abuse set out below and investigations should aim to capture the full context of the recipient's lived experience. This should be done by adopting a Contextual Safeguarding approach.

Abusive behaviour can happen in or outside of the College setting therefore it is necessary to consider this and how it can be managed.

Appropriate support and interventions should be considered to meet the needs of the individuals and preventative strategies may be put in place to reduce further risk of harm wherever possible.

At HCA we are committed to addressing child on child abuse and all students are made aware of what constitutes this type of abuse and that it will not be tolerated. Child on child abuse will not be passed off as 'banter'.

Research suggests that child on child abuse may affect males and females differently, and that this difference may result from societal norms rather than biological make-up.

It should be recognised that barriers to disclosure may also be different. As a result, the

College is committed to exploring the gender dynamics of child on child abuse within our setting, including reviewing our recorded data of incidents for any trends around gender, and highlighting gender differences in staff training. Recognising that these may play out differently if there is a gender imbalance (Farrer and Co. 2017).

KCSIE 2025 states that: “Staff should be aware that girls are more likely to be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys”.

“Schools and colleges need to explore the gender dynamics of child-on-child abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender-imbalanced environments”

It is important to consider that children, young people and adults with an Education Health and Care Plan (EHCP) and disabilities can face additional safeguarding challenges.

KCSIE 2025 states that; “Children with special education needs and disabilities (SEND) are also three times more likely to be abused by their peers”

Additional challenges can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- Being more prone to peer group isolation than others;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, the College will ensure extra vigilance within teaching areas and public spaces, ensure that students with SEN and disabilities are fully aware of the behaviours that constitute child on child abuse and offer extra pastoral support when investigating any child on child abuse allegations.

This policy has been produced for both the alleged victim and alleged perpetrator. It should be remembered that many who present with harmful behaviour towards others, are themselves vulnerable and may have been victim of abuse by peers, parents or adults prior to their abuse of peers.

iv. Types of abuse

There are many forms of abuse that may occur between children and young people, this may include but not limited to:

- **Physical abuse** e.g. (biting, hitting, kicking, hair pulling etc.) Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person.
- **Sexually harmful behaviour/sexual abuse** e.g. (inappropriate sexual language, touching, sexual assault etc.) Sexually harmful behaviour may range from

inappropriate sexual language to sexually touching another, sexual assault, rape or abuse.

- **Sexual violence and sexual harassment**, sexual violence and / or sexual harassment can occur between two children, young people or adults of any age and sex. It can also occur through a group of children, young people or adults sexually assaulting or sexually harassing a single child, young person or adult.

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he/they intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he/they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual harassment (read in conjunction with the Bullying, Harassment and Sexual Misconduct Policy). Sexual Harassment is described as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a person's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

v. Serious crime

All staff should be aware of indicators, which may signal that a child, young person or adult is at risk from, or involved with serious, violent crime. These may include:

- Unexplained, increased, or prolonged absence
- a change in friendships with individuals or groups
- a significant decline in performance
- Signs of harm (including self-harm) or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions that could indicate communication with individuals associated with criminal networks and/ or gangs and so putting them at risk of manipulation/exploitation.

vi. Bullying (inclusive of all types)

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (cyber-bullying via text messages, social media or gaming, which can include the use of images and video). Bullying may be motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities. Bullying involves an imbalance of power between the recipient and person causing harm.

The imbalance of power can manifest itself in several ways, it may be physical, psychological or an intellectual imbalance. It can result in the intimidation of a person(s) through the threat of violence or by isolating them either physically or online.

vii. Cyber bullying

Cyber bullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites to harass threaten or intimidate someone. Forms of cyber bullying can be seen as criminal behaviour under the Malicious Communications Act 1988. Section 1 states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. If behaviours involve the use of, taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. If cyber bullying is believed to fit into either of the definitions found in Malicious Communications Act 1988 and / or Sexual Offences Act 2003 HCA will report the issue to the police.

viii. Sexting (Youth Produced Imagery)

Sending or receiving a sexually explicit text, image or video. This includes 'nude pics' and / or 'nude selfies'. Having in their possession or distributing indecent images of a person under 18 on to someone else is a criminal offence under the Sexual Offences Act 2003 and as such is a reportable offence.

ix. Upskirting

Upskirting is an offence under The Voyeurism (Offences) Act 2019. The Criminal Prosecution Service defines 'upskirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. This which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

x. Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical and / or emotional, which causes someone to feel powerless, worthless, excluded, or marginalised. Such behaviour can be based around prejudice regarding (but not limited to): SEN, disabilities, ethnic, cultural, and religious backgrounds, gender and sexual identity.

xi. Relationship abuse

Relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by a partner. This can be an adolescent (up to the age of 18 years) or an adult (over the age of 18 years) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse.

xii. Frivolous or vexatious complaints

The College may reject a complaint if in the judgement of the Vice Principal of FE or HE in consultation with another member of the Senior Leadership Team it is considered to be frivolous or vexatious.

Examples might be:

- a. Complaints that are designed to cause disruption or annoyance
- b. Demand redress that lacks serious purpose or value

If the complaint is judged frivolous or vexatious the Vice Principal of FE or HE will explain in writing the decision not to pursue the consideration of the complaint further.

2. Measuring the behaviour

i. The Context

Child on child abuse takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. It is essential that responses to incidents are proportionate and contextual.

In this policy we recognise the importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour, HSB).

HCA's Designated Safeguarding Lead and Deputy Safeguarding Leads will take advice when necessary and refer, if appropriate, to guides such as Simon Hackett's continuum of behaviour (taken from Farrer and Co. 2017)

Simon Hackett's continuum of behaviour can be a useful guide to measure the behaviour that has occurred and consider the circumstances around the incident (s). (Appendix 1)

The continuum looks at whether it:

- is socially acceptable
- involves a single incident or has occurred over a period of time
- is socially acceptable within the peer group
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
- involves a misuse of power Behaviour which is not abusive at first may potentially become abusive quickly or over time.

All staff should also be mindful of the fact that the way(s) in which children, young people and adults disclose or present with behaviour(s) may differ depending on their lived experience. Some actions, behaviours may have been normalised by the recipient/child causing harm due to prolonged exposure.

3. Procedure for responding to a report

The immediate response to a report

The college will take all reports seriously and will reassure the alleged recipient of abuse and all those involved that they will be supported.

- All staff should record a report on MyConcern and ensure the Designated Safeguarding Lead (DSL) or a deputy is aware.
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the designated safeguarding lead / external partner services); staff will however only share the report with those people who are necessary to progress it. Additional information on confidentiality and information sharing can be found at [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/information-sharing-advice-for-safeguarding-practitioners)
- A written report on MyConcern will be made as soon after the discussion 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 later.
- Staff should assess the needs and safety of all parties involved.

- Where appropriate risk assessments should be put in place for all involved.
- Where the report includes an online element, the College will follow advice on searching, screening, and confiscation. The staff will not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present. Staff should be aware of the advice outlined in [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
- The DSL will be informed as soon as possible and consider a referral to the police and social care using the flow charts (Appendix 2).
- The DSL must complete a Safety plan (Appendix 3) where sexual violence has occurred. This must be shared with the MASH.

When recording behaviour, it is essential to

- Record as soon as possible, as you can quickly forget or confuse detail
- Be clear, explicit, and non-avoidant, and avoid vague statements or euphemisms
- Use proper names for body parts but record exactly any language or vocabulary used by the child. Use the child's exact words in quotation marks.

Note where and when the incident happened and whether anyone else was present

Points to consider when gathering evidence

Once a complaint has been made or an incident(s) recognised it will be necessary to gather information in order to obtain a true and accurate account of the facts surrounding the incident (s). At this point it is important to consider the language used and the impact of that language on all parties involved. For example; use of the words (with those being interviewed) such as investigation, victim and perpetrator should be avoided as these can create an atmosphere of 'blame'. Staff dealing with the issue should also be mindful of contextual safeguarding and make themselves aware of any wider and / or individual safeguarding concerns relating to all parties involved.

Wherever possible two members of staff (one being the Designated Safeguarding Lead/deputy) should be present when speaking to the alleged victim, child allegedly causing harm, and any witnesses. In all circumstances, staff need to speak to all of the involved separately, gain a statement of facts from them, and use consistent language and open questions. A full and clear record of exactly what the person has said in their own language should be made and stored on MyConcern. The young person may bring someone to support them at this meeting, mirroring the process outlined in the Bullying, Harassment and Sexual Misconduct Policy (the role of the accompanying person is to offer support, not to speak on behalf of the alleged victim or child allegedly causing harm).

4. When should the college seek support from external agencies?

Cases of child on child abuse are often complex, may involve multiple young people and consent may be unclear. This is especially difficult when young people may be victims but also involved in the harm of others. In some instances, it may be most appropriate, for the college to respond internally. However, in other instances, cases may require a referral to the police and/or other external statutory agencies.

KCSIE 2025 states that 'Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children' - Working together to safeguard children - GOV.UK (www.gov.uk).

Once information regarding the incident(s) has been gathered the DSL or Deputy DSL should refer to the flow chart (Appendix 2) and consider the following when deciding if an incident can be dealt with in college, externally (through relevant statutory agencies) or working together.

Cases that may be best responded to in-College sit between 'Normal/Healthy' and the 'inappropriate' section on Hackett's continuum.

- 'Single instances of developmentally inappropriate sexual behaviour'
- 'Behaviour that may be socially acceptable within a peer group but not in wider society'
- 'May involve an inappropriate context for behaviour that would otherwise be considered normal'
- Generally consensual and reciprocal

Incidents where a referral to external statutory agencies is always required are defined under Hackett as 'violent and abusive'

- Victimising intent or outcome
- Includes misuse of power
- Coercion and force to ensure compliance
- Intrusive
- Informed consent lacking or not able to be freely given
- May include elements of expressive violence
- Physically violent sexual abuse
- Highly intrusive
- Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour
- Sadism

In line with responding internally, the college may decide that the children involved do not require a referral to statutory services but may benefit from early help. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

Further information on Early Help is set out in Part one of KCSIE 2025 with full details of the early help process in [Working together to safeguard children - GOV.UK](#)

Further information on early help in Herefordshire can be found at [Children's Policies & Guidance - Herefordshire Safeguarding Boards and Partnerships](#) and [Being a parent – Herefordshire Council](#)

i. Reporting to the Police

If it is found that a crime might have occurred the DSL/DDSL have a responsibility to report all alleged crimes to the police. The designated safeguarding lead (and their deputies) will also follow local processes for safeguarding referrals, i.e. making appropriate referrals to the Local Authority Designated Officer (LADO) and Multi Agency Safeguarding Hub (MASH).

Where a report of rape, assault by penetration or sexual assault is made, information will be passed on to the police as a matter of urgency.

Where a report has been made to the police, the college will consult the police and agree what information can be disclosed to staff and others. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, HCA will work closely with the relevant agencies to support all those involved (including potential witnesses). Where required, advice from the police will be sought in order to inform and assist us.

Whilst protecting the alleged victim and/or taking any disciplinary measures against the child allegedly causing harm, we will work closely with the police (and other agencies as required), to ensure any actions the College take do not jeopardise the police investigation.

Next Steps - Once the outcome of the incident(s) has been established it is essential to ensure future incidents of abuse do not occur again and consider carefully the support and intervention required for all those involved. It may be necessary to make changes and adjustments to teaching groups for those involved.

A risk assessment should be put in place for both the victim and perpetrator whilst in college, so that they have someone named that they can talk to, identify support strategies for managing future issues and identify services and any other additional support.

For the person who has displayed harmful behaviour it is important to attempt to identify why they may have behaved in such a way. It may be that the person is experiencing their own difficulties. If this is the case, there may be separate safeguarding/wellbeing issues that require action.

It is important that perpetrator receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with those involved through mediation. In the cases of harmful sexual behaviour(s) it may be a requirement for the person to engage in one-to-one work with a particular service or agency, if a crime has been committed this may be through the police or youth offending service. If there is any form of ongoing criminal investigation, it may be that the alleged victim and or perpetrator cannot be educated on site until the investigation has concluded. In which case, they will need to

be provided with appropriate support and education whilst off site.

It may be that following the conclusion of any investigation the behaviour(s) that the alleged perpetrator has displayed may continue to pose a risk to others in which case an individual risk assessment will be required. Any such assessment should be completed and include a multiagency response to ensure that the needs of the perpetrator and risks towards others are measured accurately.

Following a full investigation, the College may decide that the appropriate course of action should be suspension or exclusion (see Student Professional Behaviour and Disciplinary Policy or FE Support and Challenge Policy for procedure).

After care - It is important that following the incident (s) all those involved continue to feel supported and receive relevant and timely help and intervention. It may be that feelings of remorse, regret or unhappiness occur at a later stage when parties have had time to reflect. It is important to ensure that those involved do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). Therefore, tutors should ensure regular reviews with those involved following the incident(s). Frequency of such reviews should be agreed by all parties involved.

All parties involved should be signposted to relevant support agencies. The DSL, DDSL/Safeguarding and Prevent Manager should also make relevant referrals to support agencies as appropriate. See appendix 3.

ii. Multi-agency working

HCA is committed to multi-agency working, actively engages with local partners in relation to child on child abuse, and works closely with Herefordshire Council children's social care, and/or other relevant agencies, and other colleges

The relationships the College has built with these partners are essential to ensuring that the College is able to prevent, identify early and appropriately handle cases of child on child abuse. They help the College;

- a) To develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist.
- b) To ensure that our students can access the range of services and support they need quickly.
- c) To support and help inform our local community's response to child on child abuse.
- d) To increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our students.

The College actively refers concerns/allegations of child on child abuse where necessary to Herefordshire Council children's social care, and/or other relevant agencies.

Children and young people resident out of county but attending a Herefordshire college will be reported to their home authority social care team.

In cases involving children and young people who are subject to risk, harm, and abuse and who have Local Authority Care (Child Looked After, CLA) status, the children's/young person's social worker must be informed and a coordinated approach to address any incidents or concerns will be required.

5. Legislation, guidance and Law to be taken into consideration when applying this policy

[Child on Child Abuse Guidance and Tools - Herefordshire Safeguarding Boards and Partnerships](#)

[Keeping children safe in education 2025](#)

It is essential to note that this guidance adheres to and encourages all persons to ensure that they are adhering to the Human Rights Act 1998, specifically the right to an education, the right to a fair trial and protection from discrimination.

<https://www.equalityhumanrights.com/en/human-rights/human-rights-act>

Equalities Act 2010

This guidance is designed to ensure that the Equalities Act is adhered to at all times. The Equalities Act 2010 provides a basic framework for protection against direct and indirect discrimination, harassment and victimisation in education as well as other sectors.

- <https://www.gov.uk/guidance/equality-act-2010-guidance>

[West Midlands Procedures for Child on child abuse / harmful sexual behaviour | West Midlands Safeguarding Children Group \(procedures.org.uk\)](#)

Review of Circumstances - Following any incident of child on child abuse it will be necessary for College to consider if anything could have been done differently to in order to recognise and so prevent the issue or to intervene sooner. By reflecting on the incident and following investigation we will review and update our procedure and relevant policies accordingly.

This response may include the College asking itself a series of questions about the context in which an incident of child on child abuse occurred in the College and the wider physical and online environment - such as:

- a) What protective factors and influences exist within the College (such as positive peer influences, examples where child on child abuse has been challenged etc.) and how can the College improve these?
- b) How (if at all) did the College's physical environment contribute to the abuse, and how can the College address this going forwards, for example by improving the College's safety, security and supervision?
- c) Did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?

- d) What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forwards?
- e) Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse?
- f) How have similar cases been managed in the past and what effect has this had?
- g) Does the case or any identified trends highlight areas for development in the way in which the College works with children to raise their awareness of and/or prevent child on child abuse, including by way of the College's well-being curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work?
- h) Are there any lessons to be learnt about the way in which the College engages with parents to address child on child abuse issues?
- i) Are there underlying issues that affect other schools or colleges in the area, and is there a need for a multi-agency response?
- j) Does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour?
- k) Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the College?

Appendix 1

Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

Responding to children who display sexualised behaviour

It's important to be able to distinguish developmentally typical sexual behaviours from those that may be problematic or harmful, and make sure children get appropriate support. Always consider the child's holistic needs and safeguarding concerns alongside any sexualised behaviour and follow due procedures accordingly. This guide is a tool to support objective decision making about a child or young person's sexual behaviour and does not replace professional judgement or policy and legislation. Visit nspcc.org.uk/hsb for more information.

Need advice?

Contact our helpline for advice and support:

- Call **0800 800 5000**
- Email help@nspcc.org.uk
- Visit nspcc.org.uk/helpline

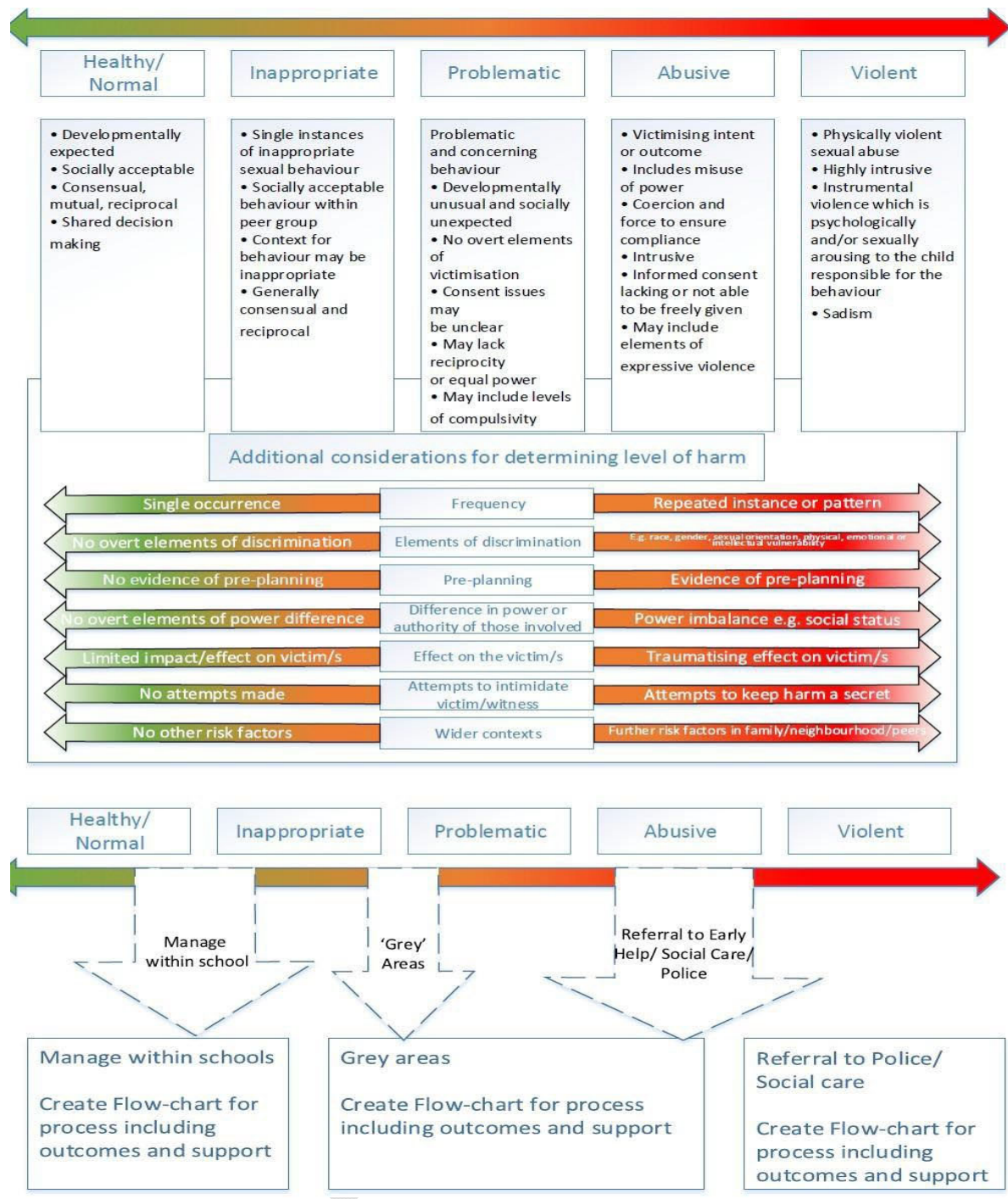
Childline

For children who need further support our free, confidential helpline is available 24/7:

- Call **0800 1111**
- Visit childline.org.uk

Developmentally typical		Problematic		Harmful	
Hackett Continuum					
Normal	Inappropriate	Problematic	Abusive	Violent	
<ul style="list-style-type: none">• Developmentally expected and socially acceptable behaviour• Consensual, mutual and reciprocal• Decision making is shared	<ul style="list-style-type: none">• Single instances of developmentally inappropriate sexual behaviour• Behaviour that may be socially acceptable within a peer group but not in wider society• May involve an inappropriate context for behaviour that would otherwise be considered normal	<ul style="list-style-type: none">• Developmentally unusual and socially unexpected behaviour• May be compulsive• Consent may be unclear and the behaviour may not be reciprocal• May involve an imbalance of power• Doesn't have an overt element of victimisation	<ul style="list-style-type: none">• Intrusive behaviour• May involve a misuse of power• May have an element of victimisation• May use coercion and force• May include elements of expressive violence• Informed consent has not been given (or the victim was not able to consent freely)	<ul style="list-style-type: none">• Physically violent sexual abuse• Highly intrusive• May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator• May involve sadism	
How to respond <ul style="list-style-type: none">• Although green behaviours are not concerning, they still require a response• Listen to what children and young people have to say and respond calmly and non-judgementally• Talk to parents about developmentally typical sexualised behaviours• Explain how parents can positively reinforce messages about appropriate sexual behaviour and act to keep their children safe from abuse• Signpost helpful resources like our 'Talk PANTS' activity pack: nspcc.org.uk/pants• Make sure young people know how to behave responsibly and safely	How to respond <ul style="list-style-type: none">• Amber behaviours should not be ignored• Listen to what children and young people have to say and respond calmly and non-judgementally• Consider the child's developmental age as well as their chronological age, alongside wider holistic needs and safeguarding concerns about the problematic sexualised behaviour• Follow your organisation's child protection procedures and make a report to the person responsible for child protection• Your policy or procedure should guide you towards a nominated child protection lead who can be notified and will provide support• Consider whether the child or young person needs therapeutic support and make referrals as appropriate		How to respond <ul style="list-style-type: none">• Red behaviours indicate a need for immediate intervention and action• If a child is in immediate danger, call the police on 999• Follow your organisation's child protection procedures and make a report to the person responsible for child protection• Your policy or procedure should guide you towards a nominated child protection lead who should be notified and will provide support• Typically referrals to children's social care and the police would be required. Referrals to therapeutic services should only be made once statutory services have been informed and followed due procedures		

Appendix 2



Appendix 3

Safety Plan for Child on child Abuse/ Harmful Sexual Behaviour

HCA takes account of the following guidance when reporting incidents, however all details are recorded on MyConcern rather than using the template provided below.

The Safety plan below is intended to be used by schools whereby an incident(s) of child on child abuse has occurred or is likely to occur and is deemed to meet level 3 and above in the 'Right Help - Right time' document.

The Safety plan will show considerations made for both/all pupils involved and will highlight the plan in place to keep all pupils safe. This will also take into consideration the wishes and feelings of all children involved.

Each section/question will be considered from the perspective of all pupils involved. Considerations will also be given for the impact on, and needs of, the wider school community. All concerns and proposed actions will be recorded.

The school will work with the local multi-agency safeguarding hub (MASH, the Education Safeguarding Lead and other agencies as necessary when completing this risk assessment.

This document should be reviewed frequently to ensure it is fit for purpose. The terms victim and child alleged to have caused harm are used to identify the children involved. NB: there should be no assumption of guilt on the part of the child alleged to have caused harm, pending investigation.

***A risk assessment should be completed for all cases relating to sexual violence or alleged sexual violence. Sexual violence is defined by the sexual offences act 2002 as "criminal acts: rape, assault by penetration and sexual assault".**

***This risk assessment should be completed with reference to Keeping Children Safe in Education 2025 and the local West Midlands policy (2.25)**

<https://westmidlands.procedures.org.uk/pkoso/regional-safeguarding-guidance/children-who-abuse-others>

Basic information		
Referrer Name and role		
Referrer Contact details (email address and phone number)		
Name of school(s) college(s) for victim(s)		
Name of school(s) colleges(s)for child/ren alleged to have caused harm		
Did incident occur on college premises? If not, where did the incident occur?		

Considerations	Risk = (Consider Victim, Child Alleged To Have Caused Harm, Other Pupils And Staff)	Risk Level (High, Medium Or Low)	Actions To Reduce Risk	Revised Risk Level (High, Medium Or Low)
What is the incident? Who was involved? Where did it happen				
Does this incident constitute a crime? Assault, sexual assault, rape, sharing of indecent images of children, etc. As such has this been referred to the police?				
Is it necessary to limit contact between the children involved? Refer to KCSiE and DFE guidance on sexual harassment and sexual violence in schools and colleges.				
Is there an actual or perceived threat from the child alleged to have caused harm to the victim and/or others?				
Is either the victim or the child alleged to have caused harm at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers)?				
Do they share college sessions?				

Considerations	Risk = (Consider Victim, Child Alleged To Have Caused Harm, Other Pupils And Staff)	Risk Level (High, Medium Or Low)	Actions To Reduce Risk	Revised Risk Level (High, Medium Or Low)
Do they share break times? Do they share peer/friendship groups?				
Do they share transport to/from college?				
Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of college?				
How can such contact be limited?				
Is there a risk of harm from social media and gossip?				

Further action taken by the college: Please duplicate this template and complete for each child involved.

Action	YES/NO	Date
Police informed		
Referral to MASH		
Referral to external support services		
Referral to internal support services		
Referral to CAMHS		
Referral to early help		
Other		

Support for Young People:

If you think that a child has been harmed or is being neglected, contact the Multi Agency Safeguarding Hub on 01432 260800, EDT out of hours 01905 768020

For advice and guidance regarding support with child on child abuse you can contact the Education Safeguarding Lead at Herefordshire council on 01432 383887

Early Help means providing the right help at the right time to help children (Aged 0 to 19) and families work through any difficulties they may have: Call 01432 260261.

The Police are also there to offer support and guidance to both alleged victims and children alleged to have caused harm, they can be contacted on 101.

Herefordshire

WMRSASC [01905 724514](tel:01905724514) is a free, confidential and non-judgmental support service for survivors who have experienced rape, assault, incest, sexual abuse, sexual harassment or any form of sexual attack, whether physical, verbal or emotional.

[West Mercia Rape & Sexual Abuse Support Centre \(wmrsasc.org.uk\)](http://wmrsasc.org.uk)

Worcester

The Glade [The Glade SARC – Sexual Assault Referral Centre \(https://theglade.org.uk/\)](https://theglade.org.uk/)

Support for children who have been involved in a case of sexual abuse/rape (Worcester based).

Gloucester

And Hope House (Gloucester based)

[Hope House Sexual Health Services | Understanding your sexual health \(https://www.hopehouse.nhs.uk/\)](https://www.hopehouse.nhs.uk/)

[Hope House Sexual Assault Referral Centre \(https://www.hopehouse.nhs.uk/sarc/\)](https://www.hopehouse.nhs.uk/sarc/)

One-to-one support at Gloucestershire Royal Hospital.

[Gloucestershire Rape and Sexual Abuse Centre \(https://www.glosrasac.org/\)](https://www.glosrasac.org/)

Free, confidential and non-judgmental support and information.

National charities:

Victim Support

A national charity dedicated to helping anyone affected by crime – not just victims and witnesses, but friends, family and anyone else caught up in the aftermath.

Rape Crisis

A national charity offering confidential help, advice and a range of Rape Crisis Centres around the UK.

Galop

A national charity providing advice and support to members of the LGBT community.

Survivors UK

A national charity supporting men who have been raped or sexually assaulted.

Crimestoppers

A national charity with a free helpline for reporting crime anonymously.

Refuge

Refuge supports women, children and men with a range of services, including refuges, independent advocacy, community outreach and culturally specific services.

Women's Aid

Women's Aid is a national charity working to end domestic abuse against women and children.

Men's Advice Line: 0808 801 0327

Confidential helpline for men experiencing domestic violence from a partner or ex- partner (or from other family members).

Useful Publications and Websites

Government Publications:

- [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education)
- [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/working-together-to-safeguard-children)
- [Sexual Offences Act 2003 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2003/62)
- [Voyeurism \(Offences\) Act 2019 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2019/11)
- Preventing youth violence and gang involvement

- [Advice to schools and colleges on gangs and youth violence - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence)
- Preventing and tackling bullying in schools
 - www.gov.uk/government/publications/preventing-and-tackling-bullying

Other useful documents:

- Sexting in schools and colleges, responding to incidents and safeguarding young people
 - [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
 - [CEOP Education \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk/education/)
 - [Eliminating Child Sexual Abuse Online – Internet Watch Foundation \(iwf.org.uk\)](https://www.iwf.org.uk/)
- Child on child Abuse
 - Farrer & Co - Child on child abuse toolkit, guidance on peer-on-peer abuse policy and template child on child abuse policy
 - [Addressing child on child abuse: a resource for schools and colleges \(farrer.co.uk\)](https://www.farrer.co.uk/resources/child-on-child-abuse/)
- Sexual bullying
 - [Sexual and sexist bullying \(anti-bullyingalliance.org.uk\)](https://www.anti-bullyingalliance.org.uk/)
 - <https://www.ncb.org.uk/resources/all-resources/filter/wellbeing-mental-health/workforce-perspectives-harmful-sexual>
- Preventing abuse among children and young people-guidance from Stop it Now
 - [Stop It Now! UK and Ireland | Preventing child sexual abuse](https://www.stopitnow.org/ohc-content/what-is-age-appropriate)
- What is Age appropriate?
 - <http://www.stopitnow.org/ohc-content/what-is-age-appropriate>
- NSPCC-Harmful sexual behaviour
 - [Types of Child Abuse & How to Prevent Them | NSPCC](https://www.nspcc.org.uk/what-we-do/our-work/child-abuse-prevention/types-of-child-abuse/)
- [Safeguarding in schools | NSPCC Learning](https://www.nspcc.org.uk/what-we-do/our-work/child-abuse-prevention/safeguarding-in-schools/)
- NCB Harmful Sexual Behaviour
- Online sexual harassment
 - [Harmful Sexual Behaviour in School Resources | SWGfl](https://www.swgfl.nhs.uk/resources/harmful-sexual-behaviour-in-school/)
 - Project deSHAME- Digital Exploitation and Sexual Harassment Amongst Minors in Europe Understanding, Preventing, Responding - [Project deSHAME | Childnet](https://www.projectdeshame.org/)
- Relationship and Sex Education HMSO
 - [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/relationships-and-sex-education-rse-and-health-education)
 - [Teaching about consent \(pshe-association.org.uk\)](https://www.pshe-association.org.uk/teaching-about-consent/)