Haberdashers' West Midlands Academies Trust

Haberdashers' Abraham Darby

Child-on-Child Abuse Policy 2026-2027

This policy will be reviewed annually and updated as necessary throughout the academic year to reflect changes in statutory guidance, legislation, local safeguarding procedures and emerging safeguarding risks. The Designated Safeguarding Lead (DSL) is responsible for ensuring that the policy remains current and reflects the safeguarding needs of the Academy.

CHILD ON CHILD ABUSE POLICY	
Named Responsibility of Policy	Miss Lorna McCurdy Assistant Vice Principal – Pastoral
Date of Policy	September 2026
Date of Review	March 2027
Date of next Review	Autumn Term 2027
Date Approved by LGB	
Governor Accountability	Pupil and Staff Welfare Committee
This policy will be readily accessible to Parents/Carers/Pupils/Staff/Visitors/Members of the Public through the school website	

Introduction

The governors, Senior Leadership Team and all staff at Haberdashers' Abraham Darby are committed to the prevention, early identification, and appropriate management of child-on-child abuse both within and beyond the school.

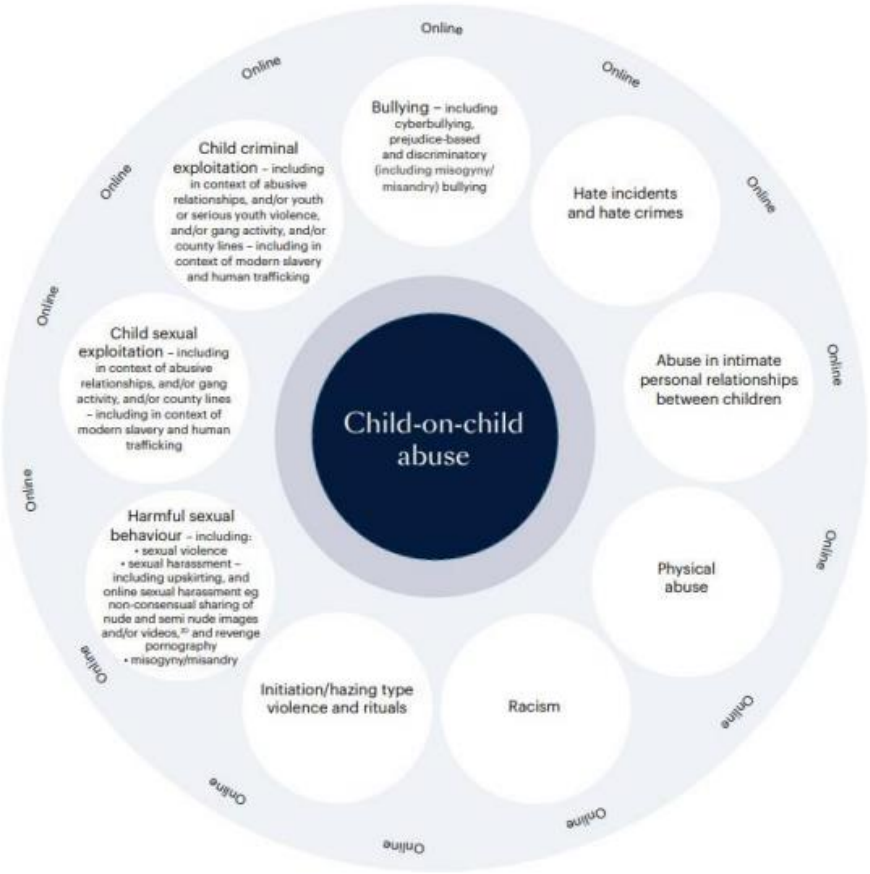
What is Child-on-Child abuse

For the purposes of this policy, child-on-child abuse refers to any form of physical, sexual, emotional or financial abuse, including coercive and controlling behaviour, occurring between children. This may take place within friendships, intimate relationships, peer groups or wider social networks, both online and offline.

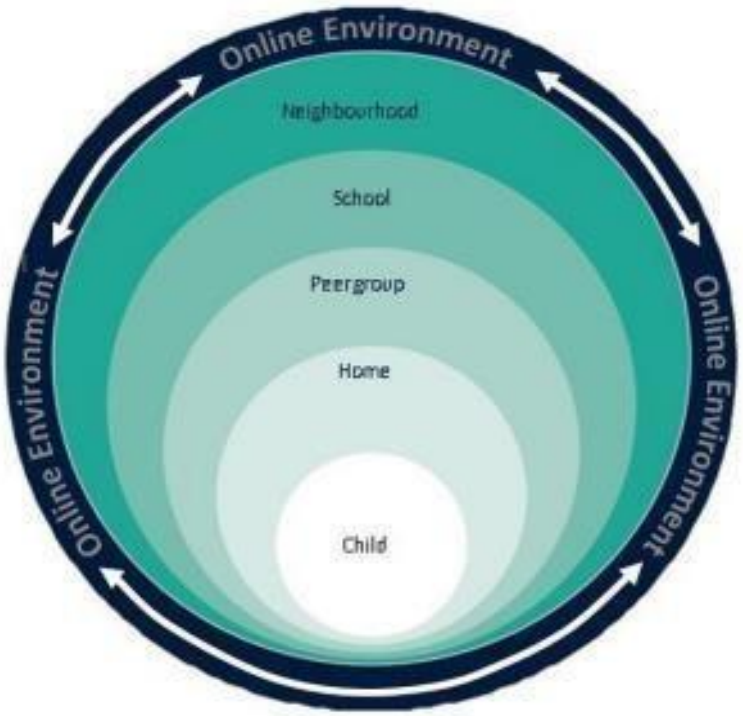
Child-on-child abuse can occur inside or outside the Academy, including during journeys to and from school, within the local community and through digital platforms. All forms of child-on-child abuse will be taken seriously, regardless of whether the behaviour is described as banter, joking or part of growing up.

Child-on-child abuse can take various forms, including (but not limited to):

(1) Serious bullying including cyber-bullying, prejudice-based and discriminatory bullying
(2) Hate incidents and hate crime
(3) Abuse in intimate personal relationships
(4) Physical abuse such as hitting, kicking, shaking, pulling hair or anything else causing physical harm.
(5) Racism – can include verbal abuse, physical attack and micro-aggression
(6) Relationship abuse, domestic violence, and abuse.
(7) Child sexual exploitation.
(8) Youth and serious youth violence
(9) Harmful sexual behaviour including sexual violence such as rape, assault by penetration and sexual assault.
(10) Sexual harassment such as sexual comments, remarks, jokes, or online sexual harassment which may be a standalone or part of a broader pattern of abuse.
(11) Upskirting which involves taking a picture under a person's clothing without them knowing.
(12) Initiations/hazing type rituals.
(13) Prejudice-based violence including, but not limited to, gender-based violence.
(14) Online abuse, including the non-consensual sharing of nude or semi-nude images, threatening or coercive messages, sexual exploitation and the creation or distribution of AI-generated or digitally manipulated sexual imagery.
(15) Misogyny, sexism, sexualised language and other forms of discriminatory or prejudicial behaviour.
(16) Coercive and controlling behaviour, including threats, intimidation, humiliation, isolation and manipulation within peer relationships.

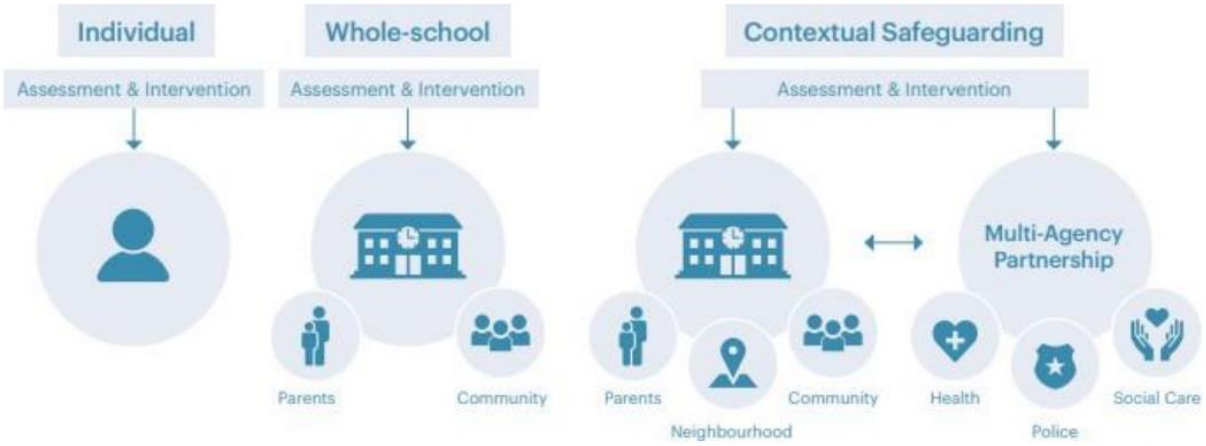


Contextual services of adolescent vulnerability.



We believe:

That in order to protect children we should (a) be aware of the nature and level of risk to which our students are or may be exposed and put in place a clear and comprehensive strategy which is tailored to our specific safeguarding context; and (b) take a whole-school community contextual safeguarding approach to responding to Child-on-Child abuse.



Regard the introduction of this policy as a prevention measure. We:

(a) do not feel it is acceptable merely to take a reactive approach to Child-on-Child abuse in response to alleged incidents of it; and
(b) believe that to tackle child-on-child proactively, it is necessary to focus on all 4 of the following areas:
    (1) systems and structures
    (2) prevention
    (3) identification
    (4) response and intervention
(c) Recognise national and increasing concern about the issue and wish to implement this policy to mitigate harmful attitudes and Child-on-Child abuse in the school setting.
(d) Encourage parents to hold us to account on this issue, so that if their child is feeling unsafe because of the behaviour of any of their peers, they should inform the school so that it can ensure that appropriate and prompt action is taken in response.

This policy:

This is Haberdashers' Abraham Darby's overarching policy for any issue that could constitute child-on-child abuse. It relates to and should be read alongside our Safeguarding and Child Protection Policy as well as other relevant school policies to include but not limited to Behaviour, Anti-bullying and Whistleblowing.

- Sets out our strategy for improving prevention and identifying and appropriately managing child-on-child abuse.
- Applies to all staff and governors and is reviewed annually and updated in the interim, as may be required to ensure that we continually address the risks to which students are or may be exposed.
- Recognises that abuse should never be passed off as "banter," just "having a laugh" or "part of growing up."
- This policy has been developed with reference to Keeping Children Safe in Education (KCSIE) 2026 and should be read alongside the Academy's Safeguarding and Child Protection Policy, Behaviour Policy, Anti-Bullying Policy and other relevant safeguarding procedures.
- Where appropriate staff will use the term "child," "children" or student, which is defined for the purpose of this policy as a person aged 18 or under. We have nonetheless chosen not to restrict our approach to child-on-child abuse under this policy to student but instead adopt a wider interpretation to our safeguarding responsibilities so that they apply to all students regardless of age.

- Where concerns involve sexual violence, sexual harassment or harmful sexual behaviour, the Academy will follow the relevant provisions of Keeping Children Safe in Education 2026, alongside current guidance from the Department for Education, UK Council for Internet Safety (UKCIS) and local safeguarding partners.
- Should be read in conjunction with the Local Safeguarding partnerships Safeguarding Policy and procedures, and any relevant Practice guidance issued.

Contextual safeguarding

What is contextual safeguarding?

Contextual Safeguarding is an approach to creating safety for children outside of their homes. Taking a contextual safeguarding approach means understanding how behaviours like child-on-child abuse can take place in different contexts and can be prevented or driven by wider cultural and environmental factors. In school this means understanding how the school context can facilitate or inhibit harm, and how relations such as friendships and peers can be sources of strength but also harm.

A contextual approach to safeguarding ensures that Academy staff and all those within a Local Safeguarding Partnership work alongside one another, rather than just refer into children's social care, to create safe spaces in which children may have encountered child-on-child abuse. This differs to traditional child protection responses where the focus was on the family.

In addition, the contextualised safeguarding approach:

- is an approach to understanding, and responding to, the risk of harm to which children can be exposed, and/or harm which they can experience, in extrafamilial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities
- recognises that as children enter adolescence, they spend increasing amounts of time outside of the home in public environments (including those online) within which they may be exposed to risk of harm and/or experience abuse, and that the different relationships that children form in their neighbourhoods, schools, colleges, and online can feature violence, coercive control, and abuse.

Parents can have little influence over these contexts, and the risk of harm to which children can be exposed, and/or harm which they can experience, outside of the family, can undermine parent-child relationships.

As part of our efforts to prevent and address child-on-child abuse, the Academy adopts a whole school contextual safeguarding approach, which means:

(1) Being aware of and seeking to understand the impact that these wider social contexts may be having on our students.

(2) Creating a safe culture by the school by, for example implementing policies and procedures that address child-on-child abuse and harmful attitudes; promoting healthy relationships and attitudes to gender/sexuality; hotspot mapping to identify risky areas in the school; training on potential bias and stereotyped assumptions.

(3) Being alert to and monitoring changes in students' behaviour and/or attendance.

(4) Contributing to local child protection agendas by for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies.

Sexual behaviours

The continuum below (Simon Hackett) demonstrates the range of sexual behaviours presented by children which may be helpful when seeking and understanding a student's sexual behaviour and deciding what if any action needs to be taken. Hackett's continuum relates exclusively to sexual behaviours and is not exhaustive.



The Academy recognises that sexual behaviours displayed by children exist on a continuum, ranging from developmentally appropriate behaviours to inappropriate, problematic, abusive and violent behaviours. Staff must not attempt to categorise or investigate harmful sexual behaviour independently. Concerns must be reported promptly to the DSL or a Deputy DSL, who will consider the circumstances, the developmental stages of the children involved, any power imbalance and the potential risk of harm.

The DSL may use recognised assessment frameworks, including Hackett's continuum and the Brook Traffic Light Tool, alongside professional judgement and advice from specialist agencies where appropriate.

How can a child who is being abused by their peers be identified?

All staff should be alert to the wellbeing of students and to signs of abuse. The Academy's Senior Leadership Team regularly, where appropriate review the behaviour incident and CPOMS logs which can help identify any changes in behaviour and/or concerning patterns or trend.

Signs that a child may be suffering from child-on-child abuse:

(1) Failing to attend school, disengaging from classes, or struggling to carry out school or extracurricular activities to the standard ordinarily expected.

(2) Regularly feeling sick/unwell in a morning

(3) Physical injuries to include unexplained bruises and cuts.

(4) Experiencing difficulties with mental health and/or emotional well-being.

(5) Becoming withdrawn and/or shy, experiencing headaches, anxiety and/or panic attacks, suffering from nightmares or lack of sleep or sleeping too much.

(6) Self-harming

(7) Unexplained gifts

(8) Broader changes in behaviour.

Abuse affects children differently and the above list is by no means exhaustive, and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that the child presents will depend on their circumstance.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to Child-on-Child abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family.

Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to Child-on-Child abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.

Research suggests that:

(1) Child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. As a result, schools 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.

(2) Children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND and additional barriers can sometimes exist when recognising abuse in children with SEND.

These can include:

(1) Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration.

(2) The potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs,

(3) Communication barriers and difficulties and overcoming these barriers.

(4) LGBTQ children and young people experience significantly higher levels of verbal, physical and sexual abuse compared to their peers

(5) Some children may be more likely to experience Child-on-Child abuse than others because of certain characteristics such as sexual orientation, trans status, disability, ethnicity, race, or religious beliefs

Child-on-child sexual violence and sexual harassment

Our community believes that sexual violence and sexual harassment is not acceptable and will not be tolerated in our Academy. Sexual violence and sexual harassment can occur between two or more children of any age and sex**.** It can happen online and also by a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment may occur concurrently.

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This consequently may affect their attainment and educational experience if the alleged perpetrator(s) attend the same school.

We will work to ensure our whole Academy community are aware of the importance of:

- challenging inappropriate behaviours and re-enforcing the understanding that sexual violence and sexual harassment is not acceptable and will not be tolerated
- not dismissing reports of or any form of sexual violence or sexual harassment
- challenging physical behaviours such as inappropriate touching, grabbing bottom, breasts and genitalia, pulling down trousers/skirts or skorts, flicking bras and upskirting.

For the purpose of this policy, we use the term 'victim', 'alleged perpetrator(s)' or where appropriate 'perpetrator(s)'.

Along with providing support to children who are victims of sexual violence or sexual harassment, we will provide the alleged perpetrator(s) with support, through education, and sanction as appropriate. We recognise that a child abusing another child may be a sign they may have been victims of abuse themselves, or a sign of wider issues that require support.

We will respond appropriately to all reports and concerns, including those that occur off site and online.

Sexual violence

Staff are aware of sexual violence and the fact children can, and sometimes do, abuse others both on and off site. Sexual violence is referred to as sexual offences under the Sexual Offences Act 2003:

- **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 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 intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Sexual harassment

Sexual harassment is any 'unwanted conduct of a sexual nature' that can occur online and offline, within or outside of our Academy. Sexual harassment in our context refers to child-on-child sexual harassment. It is likely to:

- violate a child's dignity, and/or make them feel intimidated, degraded or humiliated
- and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes
- displaying pictures, photos or drawings of a sexual nature,
- upskirting, and
- on-line sexual harassment.

See the guidance set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people.

Sharing of Nude and Semi-Nude Images

The Academy recognises that the sharing of nude and semi-nude images, including digitally manipulated and AI-generated sexual imagery, may constitute a safeguarding concern and, depending on the circumstances, a criminal offence.

All incidents involving the sharing, creation or threatened distribution of such images must be reported immediately to the DSL or a Deputy DSL.

Staff must not intentionally view, copy, print, save, forward or share such imagery. Staff must not ask children to download or forward images as evidence. Any decision to view imagery must be made by the DSL in accordance with current UKCIS guidance and only where there is a clear safeguarding justification.

Staff must not delete images or messages without first seeking advice from the DSL, as this may compromise safeguarding enquiries or a police investigation.

The DSL will assess the circumstances of each incident, including the ages of the children involved, consent, coercion, exploitation, distribution, potential criminal offences and the risk of further harm.

Where appropriate, the Academy will liaise with Children's Social Care, the police and relevant specialist services. Support and safety planning will be considered for all children involved.

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force in April 2019. This is where someone takes a picture under a person's clothing without their permission and/or knowledge, with the intention of viewing their genitals or buttocks with the intent of obtaining sexual satisfaction, or cause humiliation, distress, or alarm to the victim. It is a criminal offence and anyone of any sex can be a victim.

Harmful sexual behaviour

Children's sexual behaviour exists on a wider continuum. From normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and/or face to face. It can also occur concurrently**.**

Our safeguarding leads and deputies receive training on managing sexual violence and sexual harassment. The Brook Traffic Light is a tool that supports in identifying and dealing with issues of sexual behaviours. We understand that children who display such behaviours may have experienced this themselves and would have had some traumatic experiences. We commit to providing appropriate support.

Hate crime

A hate crime/incident is an act motivated by, or perceived to be motivated by, prejudice against another person (the victim(s)), which may be based on their race, religion, sexual orientation, gender identity, or disability. These are referred to as protected characteristics.

Hate Crime covers a range of behaviours, including discrimination, exclusion, verbal abuse, physical assault, bullying including cyber-bullying and inciting hatred. A hate crime is a criminal offence perceived by the victim or any other person to be motivated by hostility or prejudice based on a relevant characteristic. Incidents involving perceived hostility or prejudice that do not constitute a criminal offence may be considered non-crime hate incidents. All such concerns will be recorded and responded to appropriately, with police involvement considered in accordance with current guidance.

The Police and Crown Prosecution Service define hate crime as: "*Any criminal offence which is perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; or sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity."*

Hate crime can happen on or off site. We may involve external agencies in resolution, support and education, as appropriate. We will ensure that both the victim(s) and perpetrator(s) are supported. All

reported hate crime incidents must be recorded. DSLs will regularly review the data to identify trends and respond with appropriate actions.

Racist incidents

A racist incident is "any incident which is perceived to be racist by the victim or any other person", according to the Stephen Lawrence Inquiry report.

As an Academy, we will comply with the Equality Act 2010 and not unlawfully discriminate against pupils or prospective pupils on the grounds of race or other protected characteristics. In line with the Public Sector Equality Duty we will:

- Eliminate discrimination and other conduct that is prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all characteristics between people who share a protected characteristic and people who do not share it.
- Comply with guidance on suspensions and exclusions, and discrimination when making decision about suspensions or permanent exclusions.

We will investigate and record all racist incidents. We will report these incidents to the Local Authority using the designated system, Incident Reporting and Recording System (IRIS). We will aim to report incidents within 7 days of the incident being reported or as soon as reasonably practicable. The DSL will regularly review the data to identify trends and implement appropriate actions. Racist incidents will be managed in line with our Behaviour, and Anti-bullying policies.

A Whole Academy Approach

Haberdashers' Abraham Darby actively seeks to raise awareness of and prevent all forms of child-on-child abuse. We have systems in place to manage any reported incidence of child-on-child. Our Pastoral Support Officers, House team and Behaviour teams work collaboratively with the leadership team by:

(1) Educating all governors, its senior leadership team, staff, students, and parents about this issue. This includes training all governors, the senior leadership team, and staff on the nature, prevalence, and effect of child-on-child abuse, and how to prevent, identify, and respond to it.

This includes:

- Contextual Safeguarding
- The identification and classification of specific behaviours, including online behaviours.
- The importance of taking seriously all forms of child-on-child abuse (no matter how 'low level' they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing.
- Social media and online safety, including how to encourage children to use social media in a positive, responsible, and safe way, and how to enable them to identify and manage abusive behaviour online. Training includes case studies which the staff design themselves.

(2) Educating children about the nature and prevalence of child-on-child abuse, positive, responsible, and safe use of social media, and the unequivocal facts about consent, via INSIGHT and the wider curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the school's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse. Educating students about consent includes teaching them basic facts such as:

(i) a child under the age of 13 can never consent to any sexual activity
(ii) the age of consent is 16
(iii) sexual intercourse without consent is rape,

(3) Engaging parents on these issues by:

- Talking about them with parent, both in groups and one to one.
- Asking parents what they perceive to be the risks facing their child and how they would like to see the school address those risks.
- Encouraging parents to hold the school to account on this issue, in part because of visibility of this policy.

(4) Supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs. These interventions can be specific interventions and brokered through a positive relationship with the school and its staff.

(5) Working with governors, senior leadership team, and all staff, students, and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community.

(6) Creating conditions in which our students can aspire to, and realise, safe and healthy relationships fostering a whole-school culture:

- Which is founded on the idea that every member of our school community is responsible for building and maintaining safe and positive relationships, and helping to create a safe School environment in which violence and abuse are never acceptable, and in which certain behaviour such as the carrying of weapons is not tolerated
- In which students can develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts.
- in which students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to
- which proactively identifies positive qualities in Students, nurtures these qualities, teaches, and encourages students to think about positive hopes for the future; and supports students in developing small-scale goals that enable realistic ambitions.

(7) Responding to cases of child-on-child abuse promptly and appropriately and ensuring that all Child- on-Child abuse issues are fed back to the School's DSL's so that they can spot and address any concerning trends and identify students who may need additional support.

Multiagency working

Haberdashers' Abraham Darby actively engages with its Local Safeguarding Partnership in relation to child-on-child abuse, and works closely with, for example, children's social care, the police, Family Connect, and/or relevant agencies in accordance with the Local Safeguarding procedures and other schools.

The relationships the school has built with these partners are essential to ensuring that the school is able to prevent, identify early, and appropriately handle cases of child-on-child abuse. They help the school 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
- Ensure that its students can access the range of services and support they need quickly
- Support and help inform the school's local community's response to Child-on-Child abuse.
- Increase the School's awareness and understanding of any concerning trends and emerging risks in its local area to enable it to take preventative action to minimise the risk of these being experienced by its students.

The school actively refers concerns and allegations of child-on-child abuse where necessary to children's social care, the police, and/ or relevant agencies with the Local Safeguarding Partnership procedures. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the alleged incident cannot appropriately be managed internally by the school itself) to try to address the issue alone. It requires effective partnership working.

Responding to concerns or allegations of child-on-child abuse.

It is essential that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately, and promptly. The way in which they are responded to can have a significant impact on our school environment.

Haberdashers' Abraham Darby Staff will:

- Where appropriate, include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and serious- ness of the alleged incident(s), it may be appropriate for the police and/or children' social care to carry out this investigation.

- Treat all children involved as being at potential risk while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The Academy should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter.

- Consider: that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both within and outside the school); family; the school environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk, and the potential complexity of child-on-child abuse and of children´s experiences, and consider the interplay between power, choice, and consent. While children may appear to be making choices, if those choices are limited, they are not consenting,

- The DSL will consider the views, wishes and feelings of the children affected when determining the appropriate safeguarding response. Children should be given as much control as reasonably possible over decisions about their support, whilst recognising that safeguarding responsibilities may require action to be taken regardless of their wishes.

- Parents and carers will normally be informed and involved where appropriate. However, this will not take place where doing so could increase the risk of harm to a child, compromise an investigation or otherwise be contrary to the child's best interests.

- Parental consent is not required before making a child protection referral where there is a safeguarding concern that justifies sharing information. The DSL will ensure that information is shared lawfully, proportionately and in accordance with statutory safeguarding guidance and relevant data protection requirements.

- All decisions, including the rationale for sharing or withholding information, will be recorded on CPOMS.

Responding to a Disclosure of Child-on-Child Abuse

All staff must respond sensitively, appropriately and promptly when a child discloses that they have experienced or witnessed child-on-child abuse.

Staff must:

- Listen carefully and take the disclosure seriously.
- Reassure the child that they have done the right thing by speaking out.
- Remain calm and avoid expressing shock, disbelief or judgement.
- Never promise confidentiality. Explain that information will only be shared with those who need to know to safeguard the child.
- Avoid asking leading questions or conducting their own investigation.
- Record the disclosure accurately on CPOMS, using the child's own words wherever possible.
- Report the concern directly to the DSL or a Deputy DSL without delay. Recording a concern on CPOMS must not replace direct communication where immediate safeguarding action is required.
- Ensure that any immediate risk to the child or others is addressed.

Staff must not attempt to mediate between the children involved or arrange restorative conversations without prior safeguarding assessment and agreement from the DSL.

Where a child is in immediate danger, appropriate emergency action must be taken, including contacting the police or emergency services where necessary.

Managing a concern or report

Where a member of staff has concerns that a child may be experiencing, witnessing or displaying child-on-child abuse, they must report the concern to the DSL or a Deputy DSL without delay and record the concern on CPOMS in accordance with the Academy's safeguarding procedures.

Where there is an immediate safeguarding risk, staff must speak directly to a member of the safeguarding team rather than relying solely on a CPOMS notification. If the DSL or Deputy DSL is unavailable, staff must not delay taking appropriate safeguarding action, including making a referral to Children's Social Care or contacting the police where necessary.

- The DSL may discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.
- Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, to seek specialist help in preventing the images spreading further and removing the images from the internet.
- DSLs will always use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour, and (b) determine whether it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required.
- In borderline cases the DSL may wish to consult with Family Connect and/or other relevant agencies in accordance with the Local Safeguarding Partnership’s procedures on a no-names basis (where possible) to determine the most appropriate response.

Where the DSL considers that a child is suffering, or is likely to suffer, significant harm, an immediate referral will be made to Children's Social Care and, where appropriate, the police. Referrals must not be delayed whilst awaiting parental consent, further internal investigation or the availability of another member of staff.

Where concerns do not meet the threshold for statutory intervention, the DSL will consider whether early help, Family Help, targeted intervention or specialist support is appropriate, in accordance with local safeguarding partnership procedures.

The DSL will use professional judgement and, where necessary, seek advice from Family Connect, Children's Social Care, the police or other relevant safeguarding agencies.

All safeguarding decisions, referrals, advice received and actions taken will be recorded on CPOMS, including the rationale for decisions not to refer. The DSL will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

(1) Manage internally with help from external specialists where appropriate and possible. Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of the child/children and their family. These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, a specialist harmful sexual behaviour team, CAMHS and/or youth offending services.
(2) Refer the child/children to children's social care for a section 17/47 statutory assessment. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's social care in the area where the/each child lives. Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment if an incident of Child-on-Child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.
(3) Report alleged criminal behaviour to the police. Alleged criminal behaviour will ordinarily be reported to the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police. All allegations will be assessed on case-by-case basis.

Sanctions

Any Sanctions must be balanced against any police investigation, the child/children's unmet needs and any other action intervention planned regarding safeguarding concerns. Before deciding on appropriate action Haberdashers' Abraham Darby will always consider its duty to safeguard all its students in its care from harm; the underlying reason for a child's behaviour, any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children and the severity of the child-on-child abuse and the causes of it.

Risk assessment and safety planning & support

At our Academy, we accept that child-on-child abuse does happen even if it is not reported. Therefore, on the advice of the Telford and Wrekin Safeguarding Partnership we will conduct a risk assessment to help minimise any form of child-on-child abuse. We will carry out safety planning and support for individual children in response to an allegation or incident of child-on-child abuse, including sexual violence and sexual harassment.

Following a report or concern involving child-on-child abuse, the DSL or a Deputy DSL will consider whether an individual risk assessment and safety and support plan are required. Decisions will be made on a case-by-case basis, taking into account the nature and severity of the incident, the needs of the children involved and any ongoing risk of harm.

Risk assessments and safety plans may consider:

- The safety, wishes and support needs of the child who has experienced the alleged abuse.
- The needs and potential risks associated with the child alleged to have displayed abusive behaviour.

- The possibility of other children having been affected.
- Timetables, teaching groups, seating arrangements and shared learning environments.
- Movement around the Academy, including lesson transitions, social times and identified safeguarding hotspots.
- Travel to and from the Academy, including school transport where applicable.
- Online communication, social media contact and the potential for further harassment or intimidation.
- Appropriate supervision arrangements and designated trusted adults.
- Communication with parents and carers, where appropriate and safe.
- The involvement of Children's Social Care, the police or specialist services where required.

Risk assessments and safety plans will be recorded, communicated to relevant staff on a need-to-know basis and reviewed regularly. They must also be reviewed following any further incident, new safeguarding information or significant change in circumstances.

The DSL will retain oversight of all safety planning and ensure that appropriate support is available to all children involved.

DSLs will liaise with the SENDCo if any of the children involved has SEND. DSLs will liaise with the Online Safety Lead (if this is not the DSL), if the report involves online safety concerns.

The DSL/DDSLs will engage with Children's Social Care and other agencies as required. Our safety plans will consider any interventions from expert professionals.

Our commitment to responding to child-on-child abuse (including sexual violence, sexual harassment and hate crime)

At our Academy, we will follow the principles and guidance on effective safeguarding practice to help with our decisions regarding safeguarding and supporting of the victim(s) and the alleged perpetrator(s). We will consider what support is the most appropriate to support all those involved.

Victims may not want to talk about their experience immediately. We will ensure that dialogue is kept open and encouraged. We will offer the victim, a designated trusted adult in the Academy who will be best placed to encourage the victim to talk about their needs.

We recognise that a victim of sexual violence is likely to experience trauma, which at times may lead to struggles with their normal educational routines and behaviours in and around the Academy. We will seek to avoid any action that would have a negative effect, such as a feeling of isolation. This may be because of the victim's wishes and feelings. In this case, we will provide a safe space for victims.

We will provide the necessary support for victims to remain in our setting however if the trauma results in the victim being unable to do so, an alternative provision or a move to another school will be considered to enable them to continue to receive suitable education. This will only be at the request of the victim and in consultation with their parents or carers.

Criminal proceedings – managing delays

We recognise that some of these cases may progress to criminal investigation and processes. As a result, there may be delays in any case that is being progressed through the Criminal Justice System. In such circumstances, we will not await the outcome or commencement of a police investigation before implementing appropriate support for the victim, alleged perpetrator and other children in the Academy.

- We will conduct a risk assessment to help inform any decisions made
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, the DSL/DDSLs will work closely with the police and other agencies involved, to ensure any actions our Academy takes, do not jeopardise the investigation.
- We will collaborate with the police as appropriate, to ensure that any queries are resolved.

At the end of the criminal proceedings

- If a pupil/student is convicted, or cautioned for a sexual offence, we will ensure that an appropriate risk assessment is carried out and a safety plan implemented to enable relevant protections to be put in place for all the children (and staff) at the Academy. We will apply suitable actions as per our Behaviour policy.
- If the perpetrator remains in the Academy with the victim, we will be very clear about our expectations regarding the perpetrator having been convicted or cautioned. This could include expectations of behaviour and any restrictions that we deem reasonable and proportionate.
- We will ensure both the victim and alleged perpetrator remain protected, especially from any forms of bullying, cyberbullying or harassment.

Where cases require "no further action" (NFA) by the police or Crown Prosecution Service, or where there is a not guilty verdict,

- we will continue to offer support to the victim and the alleged perpetrator for as long as is necessary.
- A not guilty verdict or decision not to progress with the case is likely to be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded.
- We will discuss any decisions with the victim and continue to offer support.
- The alleged perpetrator may also require ongoing support for what will have likely been a difficult experience.

Unsubstantiated, unfound, false and malicious reports

All concerns, discussions and decisions as well as reasons for the decisions, must be recorded. Records will be reviewed to identify any patterns/trends of concern, problematic or inappropriate behaviour, so that they can be addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation needs help or may have been a victim of abuse and using this as a cry for help. In such circumstances, it may be appropriate to refer this to Children's Social Care.

If a report is shown to be deliberate or malicious, the Academy will decide whether any disciplinary action is appropriate against the individual who made (using our Behaviour policy).

Safeguarding and supporting the victim

We will follow the principles of effective safeguarding practice to help with any decisions we take to safeguard and support the victim.

We will consider:

- The age and the developmental stage of the victim
- The needs and wishes of the victim. Wherever possible, the victim, if they wish, should be able to continue in their normal routine
- Ensuring that the victim is not made to feel that they are the problem or made to feel ashamed for making a report
- The proportionality of the response. Support will be determined on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.

Victims may not wish to divulge detailed information immediately and may be more comfortable providing information piece by piece. It is essential that dialogue is kept open and encouraged. When ongoing support will be required, we will ask the victim if they would find it helpful to have a designated trusted adult to talk to. This should be the choice of the victim, which will be respected.

We are aware that sexual assault can result in a range of needs, including physical, mental and sexual health problems and unwanted pregnancy. We will do everything reasonably possible to protect the victim from any form of bullying and/or harassment because of any report they have made.

If the victim moves to another institution (for any reason), we will notify the new school/College of any ongoing support needs. The DSL will take responsibility to ensure that this happens and transfer any child protection files.

Safeguarding and supporting the alleged perpetrator(s)

This also includes any child and young people who have displayed harmful sexual behaviour

The Academy will have to make balanced considerations.

1. the need to safeguard the victim (and the wider pupil/student body)
2. the need to provide the alleged perpetrator(s) with an education, safeguarding support and appropriate disciplinary actions.

Taking disciplinary action and providing relevant support should happen at the same time if necessary.

We will also consider:

- the age and the developmental stage of the alleged perpetrator(s)
- the nature of the allegations - any child will likely experience stress because of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- the proportionality of the response.
- Appropriate support and sanctions will be considered on a case-by-case basis

An alleged perpetrator(s) may potentially have unmet needs as well as potentially posing a risk of harm to others. Harmful sexual behaviours in young children may be a symptom of either their own abuse or exposure to abusive practices and/or content.

We will seek advice, as appropriate, from the police, Children's Social Care and specialist services. It is important that the perpetrator(s) is/are also given appropriate support to stop them re-offending and to address any trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

If exclusion is the sanction for the perpetrator(s), the decision must be lawful, reasonable and fair.

School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made.

It is important that if the alleged perpetrator(s) does move to another institution (for any reason), that the new institution is informed of any ongoing support needs and potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transfer the child protection file.

Being vigilant - reporting a concern

- If a member of staff has a concern about a child, or a child makes a report to them, they should follow the Academy referral process.
- If staff have any safeguarding concerns, they must report these without delay to the Designated Safeguarding Lead (DSL), Miss Lorna McCurdy (lorna.mccurdy@taw.org.uk), or an available Deputy Designated Safeguarding Lead (DDSL). The current safeguarding team and contact details are available through the Academy's Safeguarding and Child Protection Policy and internal safeguarding information.
- Where a child is at immediate risk of harm, staff must take appropriate safeguarding action without delay, including contacting Children's Social Care or emergency services where necessary. If a pupil has a concern about a child or a child makes a report to them, they should report to a member of staff who will in turn notify the Safeguarding Team
- If a parent/carer has a concern about a child or a child makes a report to them about another child in our Academy, they must contact the school immediately on 01952386000 and ask to speak to one of the Safeguarding Leads.

Alternatively, a referral can be made using the online referral form that is available on the Academy website.

Links with other Academy Policies

This policy links to the following policies and procedures:

- Behaviour Policy (including Anti-Bullying Policy)
- Data Protection Policy
- Child Protection and Safeguarding Policy
- Staff code of conduct

Guidance and Supporting Documents

This policy has been developed with reference to the following statutory and non-statutory guidance:

- Department for Education – Keeping Children Safe in Education 2026.
- Department for Education – Working Together to Safeguard Children (current statutory guidance).
- Department for Education – Behaviour in Schools (current guidance).
- UK Council for Internet Safety – Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (2024).
- Farrer & Co – Addressing Child-on-Child Abuse: A Resource for Schools and Colleges (2024).
- NSPCC – Harmful Sexual Behaviour Framework.
- Telford & Wrekin Safeguarding Partnership – Local safeguarding procedures and guidance.
- The Academy's Safeguarding and Child Protection Policy, Behaviour Policy, Anti-Bullying Policy and Online Safety procedures.
  These documents should be consulted alongside this policy where additional guidance is required.

Term	Definition
Child-on-Child Abuse	Any form of abuse (physical, sexual, emotional, financial) inflicted by one child onto another, including within friendships, peer groups, or intimate relationships.
Contextual Safeguarding	An approach to safeguarding that considers risks children face outside the home, such as in school, peer groups, or online environments.
DSL (Designated Safeguarding Lead)	A senior staff member responsible for overseeing safeguarding and child protection in the school.
CPOMS	A secure online system used by schools to record safeguarding, wellbeing, and pastoral concerns.
Sexual Violence	Acts such as rape, assault by penetration, and sexual assault as defined by the Sexual Offences Act 2003.
Sexual Harassment	Unwanted conduct of a sexual nature that violates a child's dignity or creates a hostile environment.
Harmful Sexual Behaviour (HSB)	Sexual behaviour by children that is inappropriate, abusive, or violent, and may cause harm to others or themselves.
Upskirting	Taking a photo under someone's clothing without their consent, often for sexual gratification or to cause distress.
Hate Crime	Any criminal offence perceived to be motivated by hostility or prejudice based on

	protected characteristics such as race, religion, disability, sexual orientation, or gender identity.
Racist Incident	Any incident perceived to be racist by the victim or any other person, including verbal abuse, exclusion, or physical assault.
SEND (Special Educational Needs and Disabilities)	Children who have learning difficulties or disabilities that make it harder for them to learn than most children of the same age.
LGBTQ+	Acronym for Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, and others.
Safeguarding	The process of protecting children from abuse or neglect and ensuring their wellbeing.
Early Help Assessment	A multi-agency approach to support children and families at an early stage before issues escalate.
Safety Plan	A personalised plan to protect and support a child following a safeguarding concern or incident.
Risk Assessment	A process to identify potential risks to a child's safety and wellbeing and determine actions to mitigate those risks.
Brook Traffic Light Tool	A framework used to categorise sexual behaviours in children and young people as green (healthy), amber (potentially concerning), or red (harmful).
KCSiE (Keeping Children Safe in Education)	Statutory guidance from the Department for Education outlining safeguarding responsibilities for schools.