

Christ Church CofE Primary School

Child-on-Child Abuse Policy

Date Policy Approved:	01.10.2026
Review Date:	September 2027

Equality Statement

This policy was formulated to meet the requirements of the Equality Act 2010.

The Governing Body recognises its legal responsibilities under the Equality Act 2010. This policy will ensure equality and fairness regardless of race, sex (gender), sexual orientation, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership, disability or age.

1. Introduction

At Christ Church C of E Primary School we have a zero-tolerance approach to all forms of child-on-child abuse, including sexual violence, sexual harassment (SVSH) and harmful sexual behaviour (HSB).

We believe that child-on-child abuse is never acceptable and will not be tolerated. It will never be passed off as:

- "banter"
- "just having a laugh"
- "a part of growing up"
- "boys being boys".

We will respond to all signs, reports and concerns of child-on-child abuse, including those that:

- have happened outside our school premises; and/or
- have taken place online.

We recognise that:

- children are vulnerable to, and capable of, abusing their peers;
- such abuse is taken as seriously as abuse perpetrated by an adult;
- even if there are no reports, this does not mean it is not happening – it may not yet have been reported;
- certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, religion, gender identity and/or sexual orientation;
- children who have allegedly abused their peers or displayed harmful sexual behaviour are themselves vulnerable and may have unmet needs.

We are committed to a whole-school approach to ensure the prevention, early identification and appropriate management of child-on-child abuse within our school and beyond.

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

- the victim(s) – the child or children who have been harmed; and
- the alleged perpetrator(s) – the child or children who have allegedly harmed others.

2. Policy Development

This policy reflects Keeping children safe in education (KCSIE) 2026, in force from 1 September 2026, including Part Five on child-on-child sexual harassment and sexual violence. It should be read alongside our Safeguarding and Child Protection Policy and local multi-agency safeguarding procedures.

Our approach includes:

- early recognition and prevention of harmful sexual behaviour, sexual harassment, sexual violence and misogyny;
- recognising prejudice-based harm, serious physical harm and threats involving weapons;
- a proportionate safeguarding response to making or sharing nudes and semi-nudes, including AI-generated imagery, with clear assessment, referral and support arrangements.

The school will involve staff, governors, parents/carers and pupils, as appropriate, in reviewing how this policy works in practice.

This policy is available:

- on the school website;
- from the school office on request.

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

3. Roles and Responsibilities

All staff working with children maintain an attitude of **"it could happen here"**, especially when considering child-on-child abuse.

The Headteacher has overall responsibility for:

- this policy and its implementation;
- liaising with the Governing Body, parents/carers, the Local Authority and outside agencies.

Safeguarding is everyone's responsibility. All staff, parents/carers and pupils must know who to report to and how to report any safeguarding concerns.

Designated Safeguarding Lead (DSL) and Deputies

The Designated Safeguarding Lead and Deputies in our school are:

- **Lee Harrison** – Senior Designated Safeguarding Lead (Snr DSL)
- **Justine Watts** – Deputy DSL

- Charlotte Butcher – Deputy Headteacher and additional DSL
- Simon Moody – additional DSL

Safeguarding Governor

The nominated Governor with responsibility for child-on-child abuse (and safeguarding) is:

- **Jessica Colson – Safeguarding Governor**

If the DSL is unavailable, staff must contact a Deputy or another DSL. If none is available, staff must take timely advice from children's social care and/or police and make a referral themselves where necessary, informing the DSL as soon as possible. In an emergency, call 999. Recording on CPOMS must never delay protective action.

4. Definitions

Child-on-child abuse is most likely to include, but may not be limited to:

- **Bullying**, including:
  - cyberbullying;
  - prejudice-based and discriminatory bullying.

- Discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents. A single incident can require a safeguarding response; repetition is not a prerequisite.

- **Abuse in intimate personal relationships between children** (sometimes known as 'teenage relationship abuse').
- **Physical abuse**, such as:
  - hitting, kicking, shaking, biting, hair-pulling;
  - or otherwise causing physical harm.
    This may include an online element which facilitates, threatens or encourages physical abuse.

- Serious physical assault, or harm or threats involving a weapon.

- **Sexual violence**, such as:
  - rape;
  - assault by penetration;

    - sexual assault.
      This may include an online element which facilitates, threatens or encourages sexual violence.
- **Sexual harassment**, such as:
    - sexual comments, remarks, "jokes";
    - sexualised name-calling;
    - sexualised threats or humiliating comments;
    - unwanted sexualised touching, which may constitute sexual assault and must be considered under the sexual violence response;
    - online sexual harassment.
      These may be standalone incidents or part of a broader pattern of abuse.
- **Causing someone to engage in sexual activity without consent**, such as:
    - forcing someone to strip;
    - forcing someone to touch themselves sexually;
    - forcing someone to engage in sexual activity with a third party.
- **Consensual and non-consensual making or sharing of nudes and semi-nudes, including photographs, videos and livestreams, and digitally altered or wholly AI-generated imagery such as deepfakes.**
- **Upskirting** (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or to cause the victim humiliation, distress or alarm.
- **Initiation/hazing type violence and rituals**, which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element. Such behaviour may also be an indicator of wider exploitation such as Child Sexual Exploitation (CSE) and/or Child Criminal Exploitation (CCE) and/or County Lines.

Online Child-on-Child Abuse

Staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other harms online as well as face-to-face. In many cases, abuse will take place concurrently online and offline.

Children can abuse other children online. This can take the form of:

- abusive, harassing, misogynistic or misandrist messages;
- intimidation, threats or coercion in group chats;
- the non-consensual making or sharing of nudes and semi-nudes, including AI-generated content;
- the sharing of abusive images and pornography, including sending such content to children who do not want to receive it.

5. Recognising Child-on-Child Abuse

At Christ Church, we recognise that behaviours associated with child-on-child abuse take place on a spectrum, from inappropriate or problematic behaviour, through to abusive, harmful and criminal behaviour.

Understanding where a child's behaviour falls on this spectrum is essential to being able to respond appropriately.

We recognise that all children grow and develop at their own pace. We will use:

- our professional judgement;
- our knowledge of child development; and
- guidance such as the Simon Hackett continuum of sexual behaviours,

when responding to child-on-child abuse.

We are mindful of the protected characteristics under the Equality Act 2010 and recognise that children may be targeted, or find it harder to report, because of these characteristics.

Sexual behaviour must be understood in the context of age, development and any power imbalance, including differences in size, maturity, disability or social status. Developmentally expected behaviour must be distinguished from inappropriate, problematic, abusive or violent behaviour. Harmful sexual behaviour is a safeguarding concern for the child harmed and the child displaying it, who may also have experienced abuse or trauma.

Early action to challenge misogyny, sexualised language and discriminatory attitudes can help prevent escalation. Girls are more likely to experience sexual harassment and sexual violence and boys more likely to perpetrate it, while children of any sex can be harmed or harm others. Children under 13 cannot legally consent to sexual activity. An apparent agreement does not remove the need for safeguarding assessment.

6. Reporting and Responding

We want children, parents/carers, staff and visitors to confidently report abuse, knowing their concerns will be treated seriously.

We recognise that our school's initial response to a report of child-on-child abuse is incredibly important – how we respond can encourage or undermine the confidence of current and future victims to come forward.

We will respond to all reports of alleged child-on-child abuse, including those that:

- occur online;
- occur outside school;
- involve children from other schools.

These reports will be treated seriously. The school remains committed to supporting and safeguarding:

- the victim(s);
- the alleged perpetrator(s);

- any other child(ren) who may be affected.

We make decisions on a case-by-case basis, with the Designated Safeguarding Lead (or a Deputy) taking the lead and using their professional judgement, supported where appropriate by:

- the Local Authority;
- Children's Social Care;
- the Police;
- other specialist services.

We will ensure that we reference and follow other school policies and procedures where relevant (e.g. Safeguarding, Behaviour, Anti-Bullying, Online Safety, RSHE, Exclusions).

We have clear reporting systems for each group within our school community. The effectiveness of these systems is reviewed during the academic year and may be expanded to meet emerging needs.

6.1 Children (including bystanders)

We recognise that a victim may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and respond to. In some cases, the victim may not make a direct report; another child may report on their behalf.

All children are taught how to report concerns or incidents of child-on-child abuse and are frequently reminded of who their trusted adults are.

Children are encouraged to report any concerning behaviour to any member of staff (teaching or non-teaching). We talk about trusted adults regularly in class and through assemblies.

The member of staff receiving a report will:

1. Listen carefully to the child and take what they say seriously.
2. Use open questions only as needed to clarify the concern; avoid leading questions, investigation or repeated questioning. Record the child's own words accurately, distinguishing facts from professional assessment.
3. Explain next steps and reassure the child that they will be supported and kept safe. Make clear that reporting is right, the abuse is not their fault, and they are not causing trouble.
4. Never promise confidentiality: in line with KCSIE 2026, staff must not promise a child that they will not tell anyone about a report of abuse.
5. Make a formal record of the concern/report on the school's recording system (CPOMS) as soon as possible.
6. Inform the DSL or a Deputy as soon as practically possible, directly and immediately where there is an urgent risk. Do not rely solely on a CPOMS alert.

We understand that some children may find it difficult to report verbally. Therefore, we have additional reporting mechanisms:

- a worry box in each classroom, where children can put their name/a brief note/drawing about their concern; these are introduced at the start of each year and referred to regularly;
- opportunities through RSHE/PSHE and worship to raise worries and seek help.

Reporting arrangements will be accessible to younger children, children with SEND and those with language or communication barriers, including EAL. Adults will use appropriate communication support and remain alert to non-verbal signs. Worry boxes supplement direct reporting and must not be used for urgent concerns.

6.2 Parents/Carers

We understand that parents and carers may find it very difficult to make – or receive – a report that their child has been:

- the victim of child-on-child abuse; or
- an alleged perpetrator of child-on-child abuse.

In line with KCSIE 2026 (Part 5), we will seek advice and support from other services on a case-by-case basis. All decisions and actions taken by the school will consider:

- the needs of the individual children involved;
- any special educational needs and disabilities (SEND);
- equality considerations;
- the wider school community.

We ask that if parents/carers have concerns that their child is experiencing or allegedly perpetrating child-on-child abuse, they:

- contact the DSL or a Deputy DSL (in person or via telephone) to explain their concerns.

The DSL/Deputy will:

1. Take an initial note of the concerns;
2. Where necessary, arrange a meeting to discuss the situation in more detail;
3. Make a formal record on CPOMS;
4. Alert other relevant staff;
5. Assess immediate safety and make referrals to children's social care and/or police where indicated, following section 6.6; do not delay action while arranging a meeting.

We ask parents/carers to speak directly with the school rather than discussing individual cases with other members of the school community in person or online.

We are committed to supporting pupils and their families in all instances of child-on-child abuse. We will try to keep all parties informed of progress and any developments, while also:

- respecting GDPR and data protection law;
- complying with any ongoing investigations by statutory services.

This may mean there are times when we cannot share certain information.

Parents/carers will normally be informed about concerns involving their child. Where this could increase risk or prejudice an investigation, the DSL will agree the timing and content with children's social care and/or police, recording the reasons. Information will be shared lawfully and proportionately: data protection does not prevent necessary safeguarding information sharing.

If a parent/carer is not satisfied with our response, they should follow the school's Complaints Policy and Procedure, available on the school website and from the school office.

6.3 Staff

Our staff work closely with children and may notice a change in behaviour, presentation or engagement that suggests something is wrong, before receiving a direct report.

If staff have any concerns about a child's welfare – including concerns that a child:

- has been a victim of child-on-child abuse; or
- is perpetrating child-on-child abuse –

they must act immediately and not wait to be told.

Staff should:

- report concerns to a DSL/Deputy DSL or directly to the Headteacher;
- record concerns on CPOMS as soon as possible;
- speak to the DSL immediately where there is a risk of immediate harm.

The DSL/Deputy will seek advice from statutory services where a pupil is considered at risk or where the threshold for referral may be met.

6.4 Visitors

All visitors are made aware of our Child Protection and Safeguarding procedures and who they should report any concerns to.

If a visitor has concerns about child-on-child abuse they have witnessed or been told about, they should:

- report concerns immediately to the DSL/Deputy or a member of staff who can obtain safeguarding help;
- not wait until the end of the day, leave only a written note or assume that someone else will report it.

The member of staff receiving the report will:

- take an initial note;
- ensure a formal CPOMS record is made;

- alert the DSL/Deputy, who will seek advice from statutory services as appropriate.

6.5 Immediate safety and risk assessment

The DSL/Deputy will undertake an immediate risk and needs assessment following a report of sexual violence. Following sexual harassment, the need for an assessment will be considered case by case. Other child-on-child abuse will prompt a proportionate assessment of safety and support needs.

The assessment will consider the child harmed, other possible victims, the child alleged to have caused harm, witnesses and the wider school community. It will take account of children's wishes, age, development, SEND, power imbalances, repeated behaviour, the location and timing, online risks and any wider exploitation or abuse. It will be recorded on CPOMS and reviewed as circumstances change.

Protective action will begin immediately and will not wait for a police or social care investigation. Plans may cover supervision, classroom arrangements, toilets, breaktimes, wraparound activities, travel and off-site provision. Following a report of rape or assault by penetration, the alleged perpetrator will be removed from shared classes with the child harmed while facts are established and agencies consulted; reasonable separation elsewhere will also be considered. Other sexual harassment or violence reports require immediate consideration of proximity. These protective arrangements do not determine guilt.

6.6 Decisions and referrals

The DSL/Deputy will decide and record the response using local safeguarding thresholds and KCSIE Part Five. Options include managing internally with pastoral support, universal services and community-based Early Help, referral to Family Help (including targeted early help and section 17 children's social care support), child protection referral and reporting to police. Support routes may operate together.

Where a child has been harmed, is at risk of harm or is in immediate danger, a referral will be made to local authority children's social care; immediate danger also requires emergency action. Targeted early help through Family Help is voluntary and requires family consent. Consent is not a prerequisite to necessary child protection action.

For reports of rape, assault by penetration or sexual assault, the starting point is reporting to police, generally alongside children's social care. This applies even if the child alleged to have caused harm is under ten, when police take a welfare approach. Staff will not conduct a criminal investigation. The DSL will agree with agencies how and when to inform the alleged perpetrator and families without delaying protective action.

If a referral is not accepted or concerns remain unresolved, the DSL will seek clarification, use local escalation procedures and refer again if risks persist or circumstances change. A decision not to refer, and its rationale, will be recorded.

6.7 Making or sharing nudes and semi-nudes

Every incident requires a proportionate safeguarding response, whether described as consensual or non-consensual, and including AI-generated imagery. The DSL will assess age, development, coercion, exploitation, vulnerability and any adult involvement, following current UKCIS advice. Not every incident requires criminalisation, but apparent agreement does not remove safeguarding concerns.

Staff must report immediately to the DSL. They must not intentionally view, copy, print, save or forward images, ask a child to share or download them, or attach them to CPOMS. They must not delete images or ask a child to delete them before DSL advice. If an image is shown unexpectedly, staff should stop viewing and report what happened.

Only in the exceptional circumstances set out in UKCIS guidance may the DSL decide that viewing is necessary; the rationale and safeguards must be recorded. The DSL will follow UKCIS guidance on referrals, device handling, evidence preservation, parental involvement and safe removal of imagery, taking police advice as needed.

6.8 Ongoing support and review

The DSL will coordinate individual support for the child harmed, the child alleged to have caused harm and other affected children. Plans will identify a trusted adult, pastoral and educational support, any specialist assessment or therapeutic support, family communication and review arrangements. Children's wishes and preferred language will inform support, balanced with safeguarding duties.

The school will monitor attendance, learning, wellbeing and any intimidation, retaliation, rumours or online harassment. Support will continue where police take no further action; that outcome does not by itself establish that an allegation was false. Behaviour sanctions and safeguarding support may operate together, with appropriate SEND considerations and agency liaison.

Restorative approaches will only be considered where safe, appropriate and freely agreed; no child will be required to meet the child alleged to have harmed them, mediate or accept an apology. Safety plans will be reviewed with relevant agencies and updated when children change class, school or provision.

7. Recording and Evaluating

- A written record will be made on CPOMS as soon as possible after any disclosure or report, capturing the facts as presented by the child or person reporting.
- Records may be used as part of a statutory assessment if the case is escalated.
- The DSL/Deputy will be informed as soon as possible if they were not involved in the initial report.
- We will record:
    - decisions made;
    - reasons for those decisions;
    - any outcomes;
    - any multi-agency actions.

Any safety plans (for example, around supervision, travel, use of toilets/changing rooms, classroom seating, alternative timetable/off-site education) will:

- be recorded on CPOMS;
- be shared with relevant staff on a need-to-know basis;
- be reviewed regularly, especially if circumstances change.

Where education is provided off-site (for example, at alternative provision or another setting), safety planning will be undertaken in line with KCSIE 2026 and local safeguarding partnership guidance.

The DSL will review records for patterns, repeat incidents, vulnerable groups and unsafe locations, including prejudice-based harm. Findings will inform supervision, training, curriculum and policy changes. Governors will receive anonymised information to support oversight.

8. Strategies for Prevention

Our school actively seeks to raise awareness of and prevent all forms of child-on-child abuse through a wide range of strategies.

8.1 Staff Training

All staff (including supply staff, volunteers and governors) receive appropriate safeguarding and child-on-child abuse training, which includes:

- all forms of abuse, neglect and exploitation;
- contextual safeguarding ('harms outside the home' or extra-familial harm);
- identification and classification of specific behaviours, including sexual violence, sexual harassment and harmful sexual behaviour;
- a clear understanding that there is a zero-tolerance approach to child-on-child abuse, especially in relation to SVSH;
- recognition that no reports does not mean abuse is not occurring;
- challenging physical behaviours (potentially criminal in nature) such as:
    - grabbing bottoms, breasts or genitalia,
    - pulling down clothing,
    - flicking bras,
    - lifting skirts;
- challenging the attitudes and cultures that underpin such abuse, both inside and outside the classroom;
- ensuring the Governing Body understands its statutory safeguarding responsibilities, including having effective child protection and child-on-child abuse policies;
- feeding all child-on-child abuse concerns back to the safeguarding team, enabling them to spot patterns, trends and children needing extra support;
- regular updates regarding online risks, harms and technology-assisted abuse (including AI-generated imagery), and signposting further support and advice in relation to online safety.

All staff, including those not working directly with children, are expected to read KCSIE Part One in full. Training and updates will cover prejudice-based harm, misogyny, responding to disclosures, risk assessment, image handling and referral routes, with safeguarding updates at least annually.

8.2 Information for Children

We promote an ethos where all children:

- feel able to share their concerns openly in a non-judgemental environment;
- know they will be listened to, taken seriously and supported.

We ensure that children are:

- frequently told what to do if they witness or experience child-on-child abuse;
- taught about the impact it can have and the possible reasons behind it;
- regularly informed of the school's zero-tolerance approach to all forms of child-on-child abuse;
- reminded how to report concerns and where to go for help, support and advice.

We educate all children about the nature and prevalence of child-on-child abuse through a well-embedded RHE/RSHE/PSHE curriculum, worship and wider curriculum opportunities. This includes:

- challenging attitudes that underlie abuse, prejudice and stereotyping;
- teaching age-appropriate information about online risks and harms, including technology-assisted abuse, and signposting further support on online safety.

8.3 Information for Parents/Carers

We engage with parents/carers by:

- speaking with them individually and in groups (for example, curriculum evenings, workshops);
- providing opportunities for parents/carers to be involved in reviewing relevant policies and curriculum content;
- encouraging parents/carers to hold the school to account on safeguarding issues;
- asking parents/carers what they perceive to be the risks facing their child and how they would like to see the school address them;
- challenging attitudes that underlie child-on-child abuse, within school and the wider community;
- ensuring parents/carers understand the school's ethos and culture;
- sharing regular information regarding online risks, harms and technology-assisted abuse, and signposting further support and advice.

The DSL will signpost families to age-appropriate specialist support, including NSPCC resources and relevant Lucy Faithfull Foundation services. Resources intended for older young people will only be recommended where suitable for the child's age and needs.

8.4 RHE/RSHE/PSHE Curriculum

Our RHE/RSHE/PSHE programme is fully inclusive and developed to be age and stage of development appropriate, especially for children with SEND and other vulnerabilities.

As a school we:

- have a clear set of values and standards, upheld and demonstrated through all aspects of school life;
- support these values with a planned, evidence-based RSHE curriculum.

Through our RHE/RSHE/PSHE curriculum we promote:

- healthy and respectful relationships;
- friendships and positive peer interaction;
- boundaries and consent;
- equality, and raise awareness of stereotyping and prejudice;
- body confidence and self-esteem;
- how to recognise an abusive relationship, including coercive and controlling behaviour;
- age-appropriate learning about recognising unsafe behaviour, seeking help and the concepts underpinning:
    - sexual consent,
    - sexual exploitation,
    - abuse,
    - grooming,
    - coercion,
    - harassment,
    - rape,
    - teenage relationship abuse (intimate personal relationships between children),
    - and how to access help and support;
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

We deliver this curriculum using the JIGSAW PSHE / RSHE Programme (see the separate RSHE / PSHE Policy for further detail).

9. Breaches and Complaints

Breaches of this policy will be dealt with in the same way as breaches of other school policies, in line with:

- our Behaviour Policy;
- our Safeguarding and Child Protection Policy;
- guidance from the Headteacher and Governing Body.

If a parent/carer is not satisfied with the school's actions, they should follow the Complaints Policy and Procedure, available:

- on the school website;
- from the school office.

10. Links with Other Policies

This policy should be read alongside:

Policy	How it may link
Safeguarding & Child Protection Policy	Includes information about child protection procedures, thresholds and contextual safeguarding.
Behaviour Policy	Includes the school's behaviour system, expectations and potential sanctions.
Anti-Bullying Policy	Includes information about bullying behaviours, prejudiced-based bullying and vulnerable groups.
Online Safety / Acceptable Use Policies	Includes expectations for online behaviour, procedures for responding to online harm and cyberbullying.
Equalities Policy	Sets out our approach to tackling prejudice and celebrating differences; links to prejudice-related language, hate incidents and protected characteristics.
RSHE / PSHE Policy	Details our approach to teaching about healthy relationships, friendships, consent, and bullying, and how we meet statutory RSHE requirements.
SEND Policy	Explains how we support children with SEND who may be particularly vulnerable to or involved in child-on-child abuse.
Complaints Policy	Explains how parents/carers can make a complaint and how it will be handled.

11. Further Information and Support

Further information and support can be found through:

- Department for Education – Keeping children safe in education 2026, particularly Parts One, Two and Five: https://www.gov.uk/government/publications/keeping-children-safe-in-education--2
- UK Council for Internet Safety – Sharing nudes and semi-nudes: advice for education settings working with children and young people, including the staff overview: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
- Lucy Faithfull Foundation – specialist advice and support on preventing harmful sexual behaviour: https://www.lucyfaithfull.org.uk/
- NSPCC Learning – sexual development, harmful sexual behaviour and responding to concerns: https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour
- Nottinghamshire Safeguarding Children Partnership – local procedures, thresholds and escalation arrangements: https://nscp.nottinghamshire.gov.uk/

12. Monitoring and Review

This policy will:

- be reviewed throughout the academic year in light of emerging issues, new guidance and feedback from the school community;
- be formally reviewed annually and updated in line with KCSIE and local safeguarding arrangements.

The Headteacher, DSL and Safeguarding Governor are responsible for ensuring this policy is implemented and that practice is monitored and evaluated.