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Quality Assurance Policies & Procedures

SAFEGUARDING AND PREVENT POLICY

CHILD AND VULNERABLE ADULT PROTECTION

Appendix I

Child-on-child abuse including sexual harassment and sexual violence

Child-on-child abuse may occur inside or outside college and online; may be committed by an individual or a group; may involve harassment, violence, coercion or exploitation; and can occur even where no incidents have been formally reported.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to) bullying, including cyberbullying and prejudice-based and discriminatory bullying; sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Additional barriers can sometimes exist when recognising abuse involving children with Special Educational Needs and Disabilities (SEND). These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
- communication barriers and difficulties overcoming these barriers.

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the special educational needs co-ordinators (SENCOs)

The College has a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it

When a concern or report is received, staff must not:

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- dismiss behaviour as banter, part of growing up or normal adolescent behaviour;
- promise confidentiality, as information may need to be shared with the designated safeguarding lead or deputy and other agencies where necessary to safeguard a child;
- investigate the matter themselves or ask leading or unnecessary questions; or
- delay passing the information to the designated safeguarding lead or deputy.

Sexual violence

For the purpose of this appendix, sexual violence refers to sexual offences under the Sexual Offences Act 2003.

What is consent?

It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way.

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the college response. If in any doubt, they should seek expert advice.

It is important to note that:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape

Sexual harassment

For the purpose of this advice, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment 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.

It is important that colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal - whilst non-consensual is illegal and abusive.

Harmful sexual behaviour

Children's sexual behaviour exists on a wide 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. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can

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occur online and/or face to face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The College will take a proportionate, case-by-case and safeguarding-led approach when deciding interim and longer-term arrangements. Suspension, exclusion, timetable changes, movement between classes or sites, and other restrictions will not be applied automatically. Decisions will be informed by an assessment of risk and need, and every reasonable step will be taken to avoid placing the burden of change on, or otherwise disadvantaging, the child who has reported or experienced harm, while safeguarding all children involved.

Reporting and referral process

Any concern, disclosure or report must be passed immediately to the designated safeguarding lead (DSL) or a deputy DSL. If a child is in immediate danger or at risk of immediate harm, staff must contact the emergency services on 999 and inform the DSL or deputy without delay.

Staff must listen carefully, reassure the child, avoid leading or unnecessary questions and must not investigate the matter themselves or promise confidentiality. As staff do not currently have access to CPOMS, they must make a prompt, factual and objective safeguarding record on ProMonitor, using the child's own words where possible, and record the date, time, context, actions taken and the name of the DSL or deputy notified.

The DSL or deputy will assess the concern promptly, consider the wishes and needs of the child who has experienced harm, identify immediate and ongoing risks, and decide what safeguarding action is required. This may include seeking advice from, or making a referral to, local authority children's social care, the police or an appropriate specialist service. Where there is uncertainty about the threshold for referral, safeguarding advice will be sought and the rationale for the decision will be recorded.

Referrals will be made without delay where a child has suffered, or is likely to suffer, significant harm or where a crime may have been committed. Relevant information will be shared lawfully, proportionately and on a need-to-know basis; data protection will not prevent necessary safeguarding information from being shared. The DSL or deputy will ensure that decisions, referrals, advice received, support arrangements, outcomes and review dates are recorded, and that the safety and wellbeing of all children involved are kept under review.

Keeping children safe in education 2026: statutory guidance for schools and colleges

KCSIE 2026 – GOV.UK

Guidance

2024 guidance from the UK Council for Internet Safety (UKCIS), [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#), for managing incidents.