



Child on Child Abuse Policy and Procedural Guidance

Including Sexual Violence and Sexual Harassment Between Children

(Whole School Including EYFS)

First Issued:	September 2021	Next Review:	Spring Term 2027
Last Reviewed:	Spring Term 2026	Version:	5.0
Responsible:	Designated Safeguarding Lead		

1. Safeguarding Statement

At Orley Farm School, we safeguard and promote the welfare of every pupil and provide a safe, respectful and inclusive environment in which children can learn and thrive. We adopt a **zero-tolerance approach** to all forms of child-on-child abuse (including sexual violence, sexual harassment and harmful sexual behaviour), whether occurring in school, online, or off-site, and maintain an **“it could happen here”** mindset. All concerns are responded to promptly and proportionately, with actions guided by the child’s **best interests**, trauma-informed practice and statutory guidance in **Keeping Children Safe in Education (KCSIE 2024)**.

We ensure clear reporting routes for pupils, staff, parents and visitors; robust recording and risk assessment; and multi-agency working with Children’s Social Care and Police where necessary. We actively challenge inappropriate behaviours and attitudes and recognise that just because no reports of abuse have been made, this is not proof that the child is safe.

2. Scope and Application

This policy applies to **all** pupils (including EYFS), staff, volunteers, governors, visitors and contractors. It operates alongside the Safeguarding & Child Protection Policy, Behaviour Policy, Anti-Bullying Strategy, Online Safety Policy, RSE/PSHE Policy, Equalities Policy and Complaints Policy.

3. Legal and Statutory Framework

- **Keeping Children Safe in Education (KCSIE) 2024** – statutory guidance (Part 1; Part 5 for child-on-child sexual violence/harassment).
- **Working Together to Safeguard Children (2023)** – underpinning multi-agency safeguarding arrangements. (KCSIE 2024 aligns definitions and expectations to this).
- **UKCIS Guidance – Sharing nudes and semi-nudes** (updated March 2024) – incident management, device handling, risk assessment, education.
- **Searching, screening and confiscation (DfE, updated July 2023)** – powers and procedures for searches and confiscation.
- **Filtering and Monitoring Standards for schools and colleges (DfE)** – roles, annual review, effectiveness expectations.
- Relevant criminal law referenced within KCSIE (e.g., sexual offences; **upskirting** recognised as a criminal offence).

4. Roles and Responsibilities

All staff

- Maintain an attitude of **“it could happen here”**, challenge inappropriate behaviours and follow reporting procedures without delay.

Head

- Ensures effective implementation, oversight and resourcing of this policy; supports the DSL and liaises with governors and external partners.

Designated Safeguarding Lead (DSL): Matthew King.

Deputy DSLs (DDSLs): Rebecca Gascoigne, Melanie Gentles, Henk Richards

- Lead on case management, risk assessment, safety planning, multi-agency working, and record-keeping for all reports.
- Hold **lead responsibility** for **online safety**, including **understanding the school’s filtering and monitoring systems and processes** (supported by DDSLs/IT but not delegable), and ensuring staff training covers

roles/responsibilities in this area.

Governor with responsibility for child-on-child abuse: Dr Mary Short

- Provides governance oversight and challenge to ensure statutory requirements are met, including online safety and culture of zero tolerance.

Parents/Carers and Visitors

- Use the school's reporting routes and do not investigate or discuss allegations publicly or via social media; confidentiality is respected within statutory limits.

5. Definitions and Forms of Child-on-Child Abuse

Child-on-child abuse includes, but is not limited to:

- Bullying (cyber, prejudice-based, discriminatory).
- Abuse in relationships (e.g., teenage relationship abuse).
- Physical abuse (hitting, kicking, hair-pulling, etc.).
- Sexual violence and harassment (including online).
- Forcing sexual activity without consent (e.g., coercion, grooming).
- Sharing of nudes and semi-nudes (youth produced sexual imagery).
- Upskirting (taking inappropriate photos under clothing).
- Initiation/hazing rituals, which may involve harm or humiliation.

6. Guiding Principles

- We **assume prevalence** and act early: absence of reports does not mean absence of harassment or abuse.
- We do **not** dismiss behaviour as “banter”, “just a laugh” or “part of growing up”.
- We **prioritise the child's voice** and best interests; we are **trauma-informed** and recognise additional vulnerabilities (e.g., **children with disabilities are at higher risk**).
- We respond to **online and offline** elements together.
- We recognise that even low-level behaviours can escalate and will be addressed consistently and early.

7. Recognising Concerns

We consider: the **victim's wishes**, nature/frequency/severity, **power imbalances** (age, size, social status, SEND), and context (including online). Professional judgement is exercised in line with child development and KCSIE Part 5.

8. Reporting Routes

Children/pupils

- May report verbally, to any trusted adult, via written statements (e.g., witness statement template), or through agreed digital reporting tools. Staff must listen non-judgmentally, avoid leading questions, and make clear confidentiality cannot be promised.

Staff/volunteers

- Must record concerns **immediately** and inform the DSL/DDSL without delay.

Parents/carers and visitors

- Should report concerns directly to the DSL/DDSL (not publicly) and follow school procedures; urgent risk should be escalated to statutory services.

9. Immediate Response and Recording

- Manage disclosures with **two members of staff** where possible (preferably including DSL/DDSL). Do not promise confidentiality; explain what will happen next.
- **Record:** time/date, setting, verbatim account in child's own words, factual observations, decisions/actions and rationale. Records must enable **pattern analysis**.
- **Devices/imagery:** Staff **must not view or share illegal images**. Follow UKCIS guidance—secure and isolate devices if necessary, seek advice, and decide on police/social care referral based on risk assessment.
- **Searches:** Where a search is required, act lawfully and safely under DfE guidance (with/without consent, prohibited items, confiscation), and **involve the DSL** where safeguarding risks are identified.

10. Risk Assessment and Safety Planning

For reports of **sexual violence**, the DSL/DDSL conducts an **immediate risk and needs assessment** addressing: the victim's safety and support, risks to other children and staff, contextual factors (time, location, patterns), and any online component. Assessments are reviewed regularly and may involve social workers and specialist services. The school considers contextual safeguarding risks, including peer groups, locations and online environments where abuse may occur.

11. Management Options (Case-by-Case)

- **Internal management** within school (proportionate pastoral/behavioural response).
- **Early Help** (multi-agency, with consent).
- **Referral to Children's Social Care** (including MASH).
- **Police involvement** (criminal process alongside school safeguarding and behaviour management).

12. Unsubstantiated, Unfounded, False or Malicious Reports

All concerns, decisions and rationales are **recorded** and reviewed for patterns. Where a report is unsubstantiated/unfounded/false/malicious, consider whether the child who made the allegation **needs help** or may have been abused elsewhere; refer to Children's Social Care as appropriate. Malicious reports may lead to school disciplinary action.

13. Ongoing Response

For the Victim

- Reassure, protect from further harm, and avoid isolation. Maintain normal routines where possible; provide **tailored support**, supervision and reasonable adjustments; identify a **trusted adult**; consider external services (e.g., CAMHS, Childline, NSPCC).

For the Alleged Perpetrator(s)

- Provide safeguarding and education; address underlying needs; apply **proportionate, fair sanctions** (consider prejudice to police/social care processes and liaison as necessary). Continue monitoring and support.

For Other Pupils

- Prevent bullying or ostracism; manage social media misuse; support witnesses/bystanders who may be affected.

Parents/Carers

- Kept appropriately informed subject to data protection and statutory investigations; encouraged to use school routes (not social media); advised of Complaints Policy if dissatisfied.

14. Sanctions and Parallel Investigations

Teachers may sanction pupils based on the **balance of probabilities** even where police/social care processes are ongoing, ensuring actions do not prejudice those processes; decisions are coordinated with statutory agencies via the DSL. All sanctions are applied in line with the School's Behaviour Policy.

15. Online Elements (Including Sharing Nudes/Semi-Nudes)

- Apply **UKCIS** guidance to triage and respond to incidents (risk factors, age, coercion, capacity to consent, immediate harm). Use **Report Remove** (IWF/Childline) where appropriate and follow device handling protocols.
- Education addresses consent, boundaries, reporting barriers, and victim-blaming; staff use age-appropriate resources and avoid viewing illegal content.

16. Filtering and Monitoring (Online Safety Assurance)

- The school maintains **appropriate filtering and monitoring** systems to reduce exposure to harmful/illegal content while enabling teaching and learning; responsibilities are identified and reviewed **at least annually**.
- DSL and IT leads work together; staff induction/training covers roles/responsibilities in this area and escalation routes for flagged incidents.

17. Vulnerable Groups and Barriers to Disclosure

We recognise barriers faced by pupils with **SEND/disabilities**, those with social care involvement, and other vulnerabilities (e.g., sex, ethnicity, sexual orientation). We make **reasonable adjustments**, tailor communication, and ensure targeted support.

18. Prevention and Education (Whole-School Approach)

- **RSHE/RHE curriculum** teaches healthy relationships, consent, equality, body confidence, respect and reporting; it addresses online/offline risks and legal frameworks.
- **Staff training** covers identification, recording, risk assessment, contextual safeguarding, and online safety. Culture and routines discourage harassment; we **challenge** attitudes and behaviours early and consistently.
- **Parent engagement**: education, open communications, and clarity on reporting.

19. Data Protection and Information Sharing

We share information **lawfully and proportionately** with relevant agencies where necessary to safeguard children. Child protection records are secure, accurate, and transferred in line with KCSIE requirements. Safeguarding records are held securely on Sharepoint and accessed only by the DSL team.

20. Local Safeguarding Procedures and Contacts (Harrow)

- **Children's Access Team (MASH "Golden Number")**: 020 8901 2690 (9am–5pm, Mon–Fri)
- **Emergency Duty Team (Out of Hours)**: 020 8424 0999 (5pm–9am weekdays; 24hrs weekends/bank holidays)
- **MASH referrals**: see HSCP website/forms; professional enquiries via duty.assess@harrow.gov.uk.
- *If a child is in immediate danger, call 999 (Police) and then follow with a MASH referral once safe.*

21. Breaches and Complaints

Breaches are addressed under the school's [Behaviour Policy](#). Complaints follow the school's [Complaints Procedure](#) (available online and from the school office).

22. Monitoring and Review

This policy is **reviewed throughout the year** and formally **annually**, incorporating updates to KCSIE and local safeguarding arrangements. Governors receive termly safeguarding reports, including trends, patterns and case responses, to ensure effective oversight and challenge.

23. **Linked Policies (Cross-Reference)**

Safeguarding & Child Protection; Behaviour; Anti-Bullying; Online Safety; Equalities; RSE/PSHE; Complaints; Searching/Screening/Confiscation.

24. **Further Guidance & Support**

- **KCSIE 2024 (DfE)** – statutory guidance.
- **KCSIE 2024 – Part 5** – child-on-child sexual violence and harassment.
- **UKCIS (2024)** – Sharing nudes and semi-nudes (full guidance + one-page overview).
- **Filtering & Monitoring Standards (DfE)** – digital safeguarding standards.
- **NSPCC HSB Framework** – multi-agency responses to HSB.
- **Brook Sexual Behaviours Traffic Light Tool** – assessment support.

Appendix A – Managing a Report (Flow Overview)

1. **Receive:** Listen carefully; be non-judgmental; do not promise confidentiality; explain next steps.
2. **Record:** Factual, in the child's words; decisions/actions/rationale.
3. **Inform:** DSL/DDSL immediately (if not present).
4. **Assess:** Immediate risk/needs (victim, alleged perpetrator, others; contextual and online elements).
5. **Decide:** Management route—internal, Early Help, Children's Social Care, Police.
6. **Protect:** Implement safety plan; reasonable adjustments; trusted adult; consider timetable/space changes.
7. **Online imagery/devices:** Follow UKCIS; do not view illegal content; secure devices; consider IWF/Childline Report Remove.
8. **Review:** Update risk assessment; monitor; keep records for pattern analysis; coordinate with external agencies.

Appendix B – Indicators and Definitions (Quick Reference)

- **Sexual Violence:** Rape, assault by penetration, sexual assault (Sexual Offences Act definitions as summarised in KCSIE).
- **Sexual Harassment:** Unwanted conduct of a sexual nature (verbal/non-verbal/online).
- **Upskirting:** Taking images under clothing without consent (criminal offence).
- **Nudes/Semi-Nudes:** Youth-produced sexual imagery, consensual or coerced; respond per UKCIS.
- **HSB Continuum:** Use Brook Traffic Light Tool and NSPCC frameworks to determine response (green/orange/red).

Notes for Implementation at Orley Farm School

- Ensure **staff training** (induction and annual refreshers) includes: Part 5 expectations; responding to disclosures; online safety; roles/responsibilities for filtering/monitoring; device handling; UKCIS response protocol.
- DSL to lead an **annual review** of filtering/monitoring with IT/governors and document effectiveness, actions and vulnerabilities considered.
- Keep MASH contact details visible to DSL/DDSLs and in staff safeguarding packs; verify numbers termly.

Managing a Report of Child-on-Child abuse



Receive

Listen carefully and be non-judgemental. Don't promise confidentiality, but reassure and explain next steps.



Record

Make a factual, accurate written record, using the child's own words where possible.



Inform DSL

Report immediately to the Designated Safeguarding Lead (DSL) or Deputy (DDSL).



Immediate Response

Two staff members, including the DSL/DDSL if possible, manage the disclosure and assess risk.



Online images/devices

Do not view or forward illegal content. Seek advice from the DSL and isolate devices as required.