Child on child abuse

(including harassment & violence) policy

Policy version:	1.5
Policy Owner:	Principal – Phoenix Bay
Applies to:	Phoenix Bay School
Linked policies:	• Safeguarding and child protection policy • Relationships and behaviour policy
Review frequency:	Annually
AB Adoption Date:	July 2021
Date of recent review:	September 2026
New review date:	September 2027
Approved by:	Ross Banks – Principal  Jill Bainton – Advisory board

Version Control since July 2021

Version	Date of Change/Adopted	Reviewed by	Reason for change
1.0	July 2021	R Banks	New document
1.1	September 2022	R Banks/Laura Secker	Changes to KCSIE 2022
1.2	October 2023	J Bainton	Changes made through KCSIE 2023
1.3	October 2024	J Bainton	Changes made through KCSIE 2024
1.4	September 2025	B Miller/J Bainton	Changes made in line with KCSIE 2025
1.5	September 2026	R Banks / B Miller	KCSIE 2026 updates

Policy Contents

1	Policy statement
2	What is child on child abuse (including harassment and violence)?
3	Recognising child on child abuse (including harassment and violence)
4	Responding to alleged incidents and concerns
5	After the outcome/conclusion of the incident
6	Support for children affected by sexual assault
7	Prevention strategies
8	Helplines providing support for young people
9	Appendix's

1. Policy Statement

Phoenix Bay School places the safety and welfare of its pupils at the highest priority and is committed to safeguarding children and young people effectively at all times. The school has a zero-tolerance approach to abuse.

Phoenix Bay School recognises that children can harm their peers and can also be vulnerable to abuse by their peers. Such abuse is taken as seriously as abuse perpetrated by an adult and will not be tolerated.

Keeping Children Safe in Education 2026 states: "…abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'."

A contextual safeguarding approach will be taken at Phoenix Bay School to understand, and respond to, any occurrences of Child-on-Child abuse, recognising that children and young people who display harmful behaviours must be seen as vulnerable themselves.

Phoenix Bay School is committed to preventing, identifying and responding appropriately to child-on-child abuse at the earliest opportunity. Where such abuse is identified, child protection procedures must be followed. All children and young people who have been affected by the situation will be supported, with wider risks being considered and addressed.

Child-on-Child abuse is referenced in the Safeguarding and Child Protection Policy for Phoenix Bay School. However, the specific issues and sensitive nature of Child-on-Child abuse require this additional guidance, written in line with statutory guidance contained within:

- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges

It should be read alongside the following Phoenix Bay School policies:

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Data Protection Policy
- E-Safety Policy
- Whistleblowing and Complaints Policy
- DSL and Deputy DSL role guidance

2. What is Child-on-Child Abuse?

Child-on-Child abuse is any form of physical, sexual, verbal, emotional or financial abuse, or coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships and wider peer associations.

All staff at Phoenix Bay School should be aware that children can abuse other children. Some examples of how this can manifest include, but are not limited to:

- Prejudice-based bullying and discriminatory bullying
- Abuse in intimate personal relationships between children
- Cyber-bullying
- Physical abuse (including online elements that facilitate, threaten or encourage physical abuse)
- Serious physical assault or harm, including threats of harm involving a weapon
- Sexual violence (including online elements that facilitate, threaten or encourage sexual violence)
- Sexual harassment, including online harassment
- Sharing of abusive images and pornography
- Upskirting
- Consensual and non-consensual sharing of nude and semi-nude images/videos
- Group initiation/hazing type violence and rituals
- Misogynistic or misandrist behaviour, language or attitudes, including online behaviour

Some behaviours will need to be handled with reference to other Phoenix Bay School policies, such as Behaviour and Relationships, Anti-Bullying, Safeguarding and E-Safety.

All staff must be aware and alert to signs of Child-on-Child abuse that may occur offline and online and must follow Phoenix Bay School procedures as part of everyday practice. Staff should recognise that Child-on-Child Abuse (including Harassment and Violence) may be taking place, even if it is not reported.

Students at Phoenix Bay School must know:

- How to report concerns and feel confident they will be listened to and supported
- They can contact Childline free on 0800 1111 or visit https://www.childline.org.uk/get-support/. Adults concerned about a child can contact the NSPCC Helpline on 0808 800 5000 or visit https://www.nspcc.org.uk/about-us/our-services/nspcc-helpline/
- They can contact Childline

2.1 Vulnerable groups

It is important to always be aware that any child can be at risk of Child-on-Child abuse and that abusers can be younger than their victims.

Research suggests some groups may be more at risk. The Safeguarding Network identifies the following as particularly vulnerable:

- Those aged 10 and upwards (although victims as young as 8 identified).
- Girls and young women are more likely to be victims and boys and young men more likely to be abusers.
- Black and minority ethnic children often under identified as victims and over-identified as perpetrators.
- Young people with intra-familial abuse in their histories or those living with domestic abuse are more likely to be vulnerable.
- Young people in care and those who have experienced loss of a parent, sibling or friend through bereavement.
- Young people who have been abused or have abused their peers.

Students with Special Educational Needs and Disabilities are more at risk of abuse. Staff must be vigilant in monitoring those students who are more vulnerable. Any concerns must be reported immediately to the Designated Safeguarding Lead (DSL) and recorded on CPOMS.

It is recognised that both boys and girls experience Child-on-Child Abuse (including Harassment and Violence). Boys are less likely to report intimate relationship abuse and may display other behaviour, such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs.

3. Recognising Child-on-Child abuse

- Signs that a child may be suffering from Child-on-Child abuse can also overlap with those indicating other types of abuse and can include, but are not limited to: disengagement from classes or struggling to carry out school related tasks to their usual standard
- physical injuries
- experiencing difficulties with mental health and/or emotional wellbeing
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much
- broader changes in behaviour, such as alcohol or substance misuse
- changes in appearance and/or acting in a way that is not appropriate for the child's age
- abusive behaviour towards others

This list is not exhaustive, and if a child displays these signs, it does not necessarily indicate abuse. Staff must be alert to behaviour that might cause concern and think about what the behaviour might signify. Children should be encouraged to share with them any underlying reasons for their behaviour and, where appropriate, staff might need to engage parents/carers to understand the context more fully.

Where a child exhibits any behaviour that is out of character or abnormal for his/her age or stage of development, staff should always consider whether an underlying concern is contributing to their behaviour and, if so, what the concern is and how the child can be supported going forwards.

3.1 Abuse involving Sexual Harassment and Sexual Violence

Sexual violence and sexual harassment can occur between two children of any age and gender or a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur offline and online.

The importance of distinguishing between problematic and abusive sexual behaviour (Harmful Sexual Behaviour HSB) is recognised. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

The NSPCC defines HSB as: "Sexual behaviours expressed by children…that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child…or adult."

A continuum of children and young people's sexual behaviours developed by Simon Hackett (2010) is also helpful in considering whether behaviour is: "normal, inappropriate, problematic, abusive or violent". However, assessing where behaviour fits on this continuum can be complex. It is important to place any child's sexual behaviour within a developmental context and recognise the key differences between the motivations and meanings of such behaviours at varying stages of development. Please see Appendix A for further information.

3.2 Physical Abuse

Physical assaults and initiation violence and rituals from students to students can also be a form or child-on-child abuse. Such behaviour will not be tolerated and if it is believed that a crime has been committed, it will be reported to the police.

The principles from the Anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

Hackett's continuum model can also be referred to in this context (Appendix A) to assess where the alleged behaviour falls on a spectrum and to decide how to respond.

This could include, for example, considering whether the behaviour is:

- is socially acceptable or is socially acceptable within the peer group
- involves a single incident or has occurred over a period of time
- is problematic and concerning
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- involves an element of coercion or pre-planning
- involves a power imbalance between the child/children allegedly responsible for the behaviour
- involves a misuse of power

3.3 Online Behaviour

Many forms of Child-on-Child abuse have an element of online behaviour. Online Child-on-Child abuse is any form of child-on-child abuse with a digital element, for example, sharing self-generated intimate images or videos, online abuse, coercion and exploitation, Child-on-Child grooming, threatening language delivered via online means, distribution of sexualised content and harassment.

Please see E-Safety Policy, Anti-bullying (including Cyberbullying) and Safeguarding & Child Protection policies for further information.

4. Responding to Alleged Incidents and Concerns

Staff must follow the Phoenix Bay School Safeguarding and Child Protection Policy if a child is at risk of harm, is in immediate danger, or has been harmed. Consideration must be given to the proportionality of the response on a case-by-case basis.

When making decisions about how to deal with allegations, the age and understanding of the young person who has displayed harmful behaviour must be taken into consideration, as well as any relevant personal circumstances and how this relates to their behaviour. Phoenix Bay School must consider any disparity in age between the young person who has displayed harmful behaviour and the victim, the impact the behaviour has had on the victim, and any element of coercion or violence.

Staff at Phoenix Bay School must act immediately and report any concerns regarding Child-on-Child abuse to the Designated Safeguarding Lead (DSL) or Deputy DSL without delay. Concerns must be recorded on CPOMS in accordance with the school's safeguarding procedures.

The DSL must deal with concerns immediately and sensitively. As much information as possible must be gathered from the victim and the young person who has allegedly displayed harmful behaviour in order to gain the facts of what has happened.

The language used must be sensitive, non-judgemental and must not blame the victim. Victims must be supported and reassured that their safety and welfare within the school is the priority. Risk assessments must be implemented where necessary across the Phoenix Bay School setting.

Where significant harm is suspected, a referral must be made to the Local Authority immediately. If a threshold decision is disputed, this must be appropriately challenged. In agreement with the Local Authority, parents/carers must be informed (unless this puts them at greater risk). Where possible, parents/carers are to be informed face to face.

4.1 The immediate response to a report

- The school will take all reports seriously and will reassure the victim that they will be supported and kept safe. All staff will be trained to manage a report
- Staff must listen, ask open questions, and write down as much as possible. Language must be used that is not victim-blaming, they must be non-judgmental and reassure the child that they have not caused a problem by disclosing
- Staff will not promise confidentiality as the concern will need to be shared further (for example, with the DSL or social care). Staff will only share the report with those people who are necessary to progress it. Information can be legally shared even if the pupil states they do not want it to be
- Staff must immediately report the information to the DSL who will support the staff member to report the information to report the incident to other agencies as appropriate e.g. the placing authority and the police
- A written report will be made as soon after the interview as possible, recording the facts as presented by the child. These may be used as part of a statutory assessment if the case is escalated later
- Where the report includes an online element, the DSL must ensure that the school's procedures for searching, screening and confiscation are followed and that any safeguarding concerns are managed in accordance with the Safeguarding and Child Protection Policy and relevant statutory guidance.

The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

4.2 Considerations by the School

The school will consider:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment
- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- The ages and developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse
- Are there ongoing risks to the victim, other children, adult students or staff and other related issues and wider context

4.3 Children sharing a classroom

- Whilst the DSL establishes the facts of the case and starts the process of liaising with children's social care and the police:

The perpetrator will be removed from any classes they share with the victim.

- The school will assess how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises and on transport to and from the school.

These actions are in the best interests of both children and should not be perceived to be a judgment on the alleged perpetrator.

4.4 Response to the alleged perpetrator

Any allegation is likely to be traumatic for the alleged perpetrator. In cases of Child-on-Child abuse the alleged perpetrator must also be treated as vulnerable and may require specialist support, which should be organised by the DSL.

The DSL to meet with the Parents/Carers of the alleged perpetrator to explain the situation and what measures will be put in place to support their child. The DSL must be led by the police regarding what information can be shared with the alleged perpetrator and their family.

If the alleged perpetrator moves schools, the Designated Safeguarding Lead must ensure that all safeguarding information is shared in advance with the new school.

If the school wishes to take disciplinary action prior to the conclusion of a Police/Social Care investigation, the DSL must liaise with the police about this.

Staff must be alert to possible bullying of the alleged perpetrator either within school or online. Arrangements must be made to safeguard them. Staff must promote a culture where bullying is not tolerated.

4.5 Local Procedures

The DSL will be familiar with the local referral procedures for safeguarding and child protection concerns. They must also be familiar with local responses to sexual violence and harassment, and these must shape their own responses. The DSL will ensure that staff are aware and understand the local processes and that they are familiar with local support services.

Where statutory assessments are appropriate, the DSL will be working alongside the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support.

The placing authority must be notified immediately where it has been identified that there are immediate safeguarding concerns. It is recommended as best practice that all steps are taken to convene a multi-agency professionals meeting to review any potential risks and agree actions to be taken to safeguard the young person/young people. The DSL is responsible for this.

4.6 Reporting to the Police

Where a crime has been committed, the DSL must immediately contact the police.

Where a report has been made to the police, Phoenix Bay School will consult the police and agree what information can be disclosed to staff, students and parents/carers.

The DSL must inform the Principal and the Local Authority.

4.7 Action following a report of sexual violence and/or sexual harassment

If a student alleges that they have been raped, assaulted by penetration or sexually assaulted, this must be reported to the Police and Social Care immediately.

The student's Parents/Carers should normally be informed unless there is a risk of greater harm to the student.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs' assessment which will be recorded within one working day and recorded on CPOMS.

The risk and needs assessment should consider:

- The victim, especially their protection and support
- The alleged perpetrator; and

- All the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them

The risk assessment must be shared with the police (where requested), the relevant local authority and the Principal, where appropriate. The risk assessment will be kept under review by the DSL and updated as necessary.

Where there has been a report of sexual harassment, a risk assessment should also be completed.

Staff must ensure that their response to sexual violence, harassment or harmful behaviours between children of the same sex is equally robust as it is for sexual violence and harassment between children of the opposite sex.

The DSL must inform the Principal of any reports of sexual violence, sexual harassment or harmful behaviours.

5. After the Outcome/conclusion of the incident

At Phoenix Bay School:

- A contextual safeguarding approach must be taken
- Support for the victim must be offered and provided
- A risk assessment must be completed for the young person who has displayed harmful behaviour
- Phoenix Bay School will not adopt a victim-blaming approach
- Lessons must be learned to prevent recurrence

5.1 The end of the criminal process

If a child is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all children. We will consider any suitable action following the School's Behaviour & Relationship policy. If the perpetrator remains in school, expectations regarding the perpetrator will be clearly set out now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school thinks are reasonable and proportionate about the perpetrator's timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other students in the school. The school will take measures to protect all children involved, especially from any bullying or harassment offline and online.

Where cases are classified as "no further action" (NFA'd) by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school will continue to offer support to the victim and the alleged perpetrator for as long as is necessary. A not guilty verdict or a

decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will continue to support all parties in this instance.

6. Support for Children Affected by Sexual Assault

Where there is a criminal investigation, the alleged perpetrator will be removed from any shared classes with the victim and consideration will be given as to how best to keep them a reasonable distance apart on the premises of Phoenix Bay School, or on school transport. This is in the best interests of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings. The school will work closely with the police.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, Phoenix Bay School will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or setting would seriously harm the education or welfare of the victim (and potentially other students).

Where a criminal investigation into sexual assault leads to a conviction or caution, Phoenix Bay School will consider any suitable sanctions in line with the Behaviour Policy, including consideration of permanent exclusion.

Where the perpetrator is going to remain within a Phoenix Bay School, the principle will be to continue keeping the victim and perpetrator in separate classes and to continue to consider the most appropriate way to manage potential contact on school premises and transport.

The nature of the conviction or caution and the wishes of the victim will be especially important in determining how to proceed in such cases. Phoenix Bay School will support the victim of sexual assault to remain in their current setting; however, if they are unable to do so, we will enable them to continue their education elsewhere. This decision will only be made at the request of the child and their family.

If the victim is moved to another setting, the Designated Safeguarding Lead (DSL) will support this transition and ensure the receiving school is aware of the ongoing support required.

All of the above will be considered with the needs and wishes of the victim at the heart of the process (supported by parents/carers as required). Any arrangements will be kept under regular review.

Further support for victims of sexual assault is available from a variety of agencies (see Appendix B), including organisations such as Rape Crisis England & Wales and The Survivors Trust.

7. Prevention Strategies

Raising Awareness and Preventing Child-on-Child Abuse

Phoenix Bay School actively seeks to raise awareness of and prevent all forms of Child-on-Child abuse by:

- Educating the Principal, Senior Leadership Team, staff and volunteers, students, parents, and carers about this issue. This includes training the Principal, Senior Leadership Team, staff, and volunteers on the nature, prevalence, and effect of Child-on-Child abuse, and how to prevent, identify, and respond to it and challenge attitudes that underlie such abuse.
- Taking appropriate action to ensure that children and young people learn about appropriate relationships with adults, online safety, as well as sex and healthy relationships. PSHE lessons, Relationships Education, and Relationships and Sex Education will focus on important age-appropriate and developmentally appropriate issues in line with Government guidance.
- Supporting children to understand what abuse is and the impact it can have on those who experience it.
- Creating a culture in which students feel able to share their concerns openly, in a non-judgmental environment and have them listened to. Students are clear about how to report abuse or any concerns about possible abuse or harmful behaviour. This includes being able to access in private, relevant websites or helplines, such as Childline and the NSPCC, to seek advice and help.
- Recognising that some children and young people are more vulnerable by virtue of complex health or behavioural needs, or disabilities. In these instances, all staff have a responsibility to be the 'eyes and ears' and report all concerns to the DSL. Consideration will be given as to whether additional support for children with protected characteristics is required.
- Engaging parents/carers by:
    - Talking about this issue with parents/carers.
    - Asking parents/carers what they perceive to be the risks facing their child and how they would like the school to address those risks.
    - Involving parents/carers in the review of school policies and lesson plans.
    - Encouraging parents/carers to hold the school to account on this issue.
- Ensuring that all Child-on-Child abuse issues are fed back to the Principal and DSL, so that they can spot and address any concerning trends and identify students who may need additional support.
- Working with the Principal, Senior Leadership Team, staff, volunteers, students, and parents to address equality issues, promote positive values, and encourage a culture of tolerance and respect among all members of the school community.
- Working with multi-agency partners to further understand and address Child-on-Child abuse and reduce its occurrence.

7.1 Risk Assessment

Phoenix Bay School will conduct a proactive risk assessment to determine the risks to which students are or may be exposed and will assess and monitor those risks. This is distinct from the assessments conducted following concerns or allegations. The risk assessment may include:

- The composition of the pupil population, including specific characteristics that affect their vulnerability to Child-on-Child abuse, for example, gender, age, special educational needs and/or disabilities, sexual orientation, and/or religious belief.
- Which students are more at risk of being affected by Child-on-Child abuse.
- Any relevant trends in behaviour.
- Environmental factors and local awareness, for example, high levels of gang activity.
- Online activities and vulnerabilities.

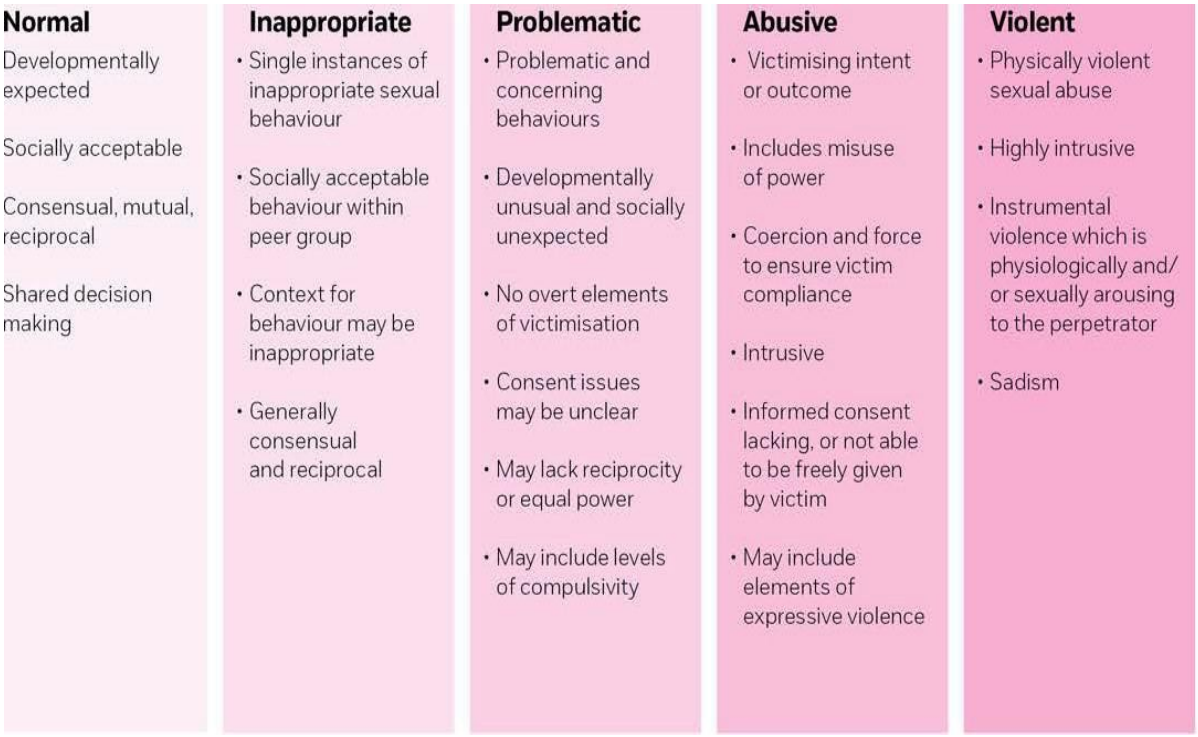
This risk assessment should be reviewed and updated at least annually and after any incident of child-on-child abuse.

8. Helplines

- Childline: https://www.childline.org.uk/get-support/
- NSPCC: https://www.nspcc.org.uk/keeping-children-safe/our-services/nspcc-helpline/
- Barnardo's: https://www.barnardos.org.uk/what-we-do/protecting-children/sexual-abuse
- Safe line: https://www.safeline.org.uk/what-we-do/young-people/

9. Appendix A

Continuum Model of Behaviours
Simon Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:
Please see: https://learning.nspcc.org.uk/media/1657/harmful-sexual-behaviour-framework.pdf for the full Harmful Sexual Behaviour Framework developed by NSPCC in partnership with Research in Practice, Durham University and the NHS.



Appendix B

Useful Publications and Websites

Government Publications

Government Publications

Sexual harassment and sexual violence in schools
www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children- in-schools-and-colleges

Keeping Children safe in Education

www.gov.uk/government/publications/keeping- children-safe-in-education

Preventing youth violence and gang involvement
www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence

Preventing and tackling bullying in schools
www.gov.uk/government/publications/preventing-and- tackling-bullying

Safeguarding Network

https://safeguarding.network/safeguarding-resources/peer-peer-abuse/

Other useful documents

Child-on-Child abuse toolkit by Farrer &Co Guidance on child-on-child abuse policy and template child-on-child abuse policy https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/farrer--co-safeguarding- Child-on-Child-abuse-toolkit-2019.pdf

Towards a Contextual Response to Child-on-Child Abuse https://www.csnetwork.org.uk/assets/documents/Towards-a-Contextual-Response-to-Peer-on- Peer-Abuse_161013_170057.pdf

Beyond Referrals: CSN Beyond Referrals: Levers for Addressing HSB in Schools Toolkit.

There are some useful links on the section on sexual bullying:-

Sexual bullying: developing effective anti-bullying practice – A guide for school staff and other

professional

Preventing abuse among children and young people: Stop it now

What is Age appropriate? http://www.stopitnow.org/ohc-content/what-is-age-appropriate

Brook Traffic lights https://www.brook.org.uk/our-work/using-the-sexual-behaviours-traffic-light-tool

NSPCC-Harmful sexual behaviour https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/harmful-sexual- behaviour/ NCB Harmful Sexual Behaviour: National Children's Bureau

NSPCC –Is this sexual abuse? https://www.nspcc.org.uk/globalassets/documents/research-reports/nspcc-helplines- report-peer- sexual-abuse.pdf

Online sexual harassment

Project deSHAME- Digital Exploitation and Sexual Harassment Amongst Minors in Europe Understanding, Preventing, Responding

https://www.childnet.com/our-projects/project-deshame Sexism

It's Just Everywhere- a study on sexism in schools –and how we tackle it https://ukfeminista.org.uk/wp-content/uploads/2017/12/Report-Its-just-everywhere.pdf Relationship Education, Relationship and Sex Education: Relationship education