St Alban's C.E Primary School

Child on child abuse, sexual violence and sexual harassment policy

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Children and Learning Directorate

Child on child abuse and sexual violence and harassment: guidance for schools and colleges in Camden
2026

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1 Introduction

Keeping children safe in education places a duty on schools and colleges to safeguard the welfare of pupils and provide a safe learning environment. One aspect of safeguarding that schools and colleges must ensure is responding to incidents of bullying and abuse, including sexual violence and harassment, that occur between pupils.

"Child on child abuse" is defined as the bullying, abuse or exploitation of a young person by peers of a similar age where the children involved are both under 18. It can take many forms, such as bullying and sexual harassment, and can take place online or in the real world.

2 Purpose and scope

All schools and colleges must have policies and processes in place that sets out the whole-school approach to child-on-child abuse setting out how school/colleges will work to prevent child on child abuse and how incidents will be responded to.

Schools/colleges need to ensure that there is a balanced response to incidents that considers the needs of the children involved whilst ensuring the safety of all pupils. Research shows that children who harm other children may be victims of abuse or have considerable needs themselves. Sometimes the abusive behaviour may constitute a criminal offence and the perpetrator who abuses may also be dealt with via the criminal justice system.

Schools should create an environment and culture where:

- child on child abuse, including sexual harassment and online sexual abuse, are not tolerated
- pupils feel confident to report their concerns and that the school will take them seriously
- issues are identified and addressed early.

Schools should have a whole school approach to preventing and tackling child on child abuse including;

- a well-planned and taught Relationships, Sex Education and Health Education curriculum (usually through PSHE)

- a system for analysing incidents and intervening early
- training for all staff so that responses are consistent.

This document provides a model policy that schools and colleges can use to inform the approaches and responses to incidents in order to:

- protect the victim and other pupils from harm
- meet the needs of the victim and the perpetrator
- help the perpetrator take responsibility for their behaviour
- provide referral pathways to social care services where appropriate to support victims and perpetrators.

3 Standards, aims and objectives

- Schools/colleges should have a whole school approach to preventing child on child abuse and sexual violence and harassment, and systems in place to identify risks and take appropriate action to deal with incidents. This approach should be reflected in relevant policies such as behaviour management, online safety, staff conduct etc.

- Schools/colleges should ensure a planned PHSE curriculum conveys the school/college's policy for preventing child on child abuse and promoting respectful behaviour between pupils, particularly in relation to sexual conduct, and statutory sex and relationships education should provide opportunities to convey messages on respectful personal and sexual relationships.

- Schools/colleges should carry out a risk assessment to identify the type and prevalence of child-on-child abuse and any recognisable trends, with a view to putting in preventative measures, and in particular consider any specific community-based risks that the school/college may face, for example gangs, county lines etc.

- Schools/colleges should provide an environment of openness where pupils feel safe to disclose incidents and concerns knowing that they will be taken seriously and acted on.

- Pupils should be informed of procedures for reporting incidents and concerns, and all staff should receive the training necessary to respond sensitively and effectively to these.

- The school/college behaviour policies should set out clear expectations of behaviour for pupils and expected sanctions for any breach. Parents should be made aware of these policies.

- The school/college should operate a zero-tolerance policy on inappropriate and discriminatory language and behaviour, including sexualised language and behaviour.

- Staff should be expected to respond appropriately to challenge any inappropriate or discriminatory language or behaviour under school/college policies and should not ignore, condone or otherwise minimise such behaviour in pupils or other staff.

- Schools/colleges should recognise that some pupils are more vulnerable to child-on-child abuse, for example pupils with SEND, and take steps to ensure they are able to seek help, ensuring policies are flexible to respond to their specific needs.

- Schools/colleges should recognise the role of technology in facilitating bullying, abuse and exploitation, especially sexual harassment and exploitation, and be aware that many incidents will take place online. These incidents should be dealt with under the *model online safety policy for schools and colleges* available on the CSCP schools safeguarding policies webpage.

- Schools/colleges should be aware of incidents involving pupils that take place outside of school and the need to respond appropriately to support victims and maintain a safe school environment.

- Schools/colleges must be aware of the following when considering the school/college response to child-on-child abuse and sexual violence and harassment:

    - Child on child abuse is likely to breach the pupil's rights under the Human Rights Act 1998.

    - Some forms of abuse will involve prejudice-based bullying and harassment, or sexual violence or harassment which is primarily directed against specific groups of pupils, and the school/college must be aware of their duty under the Equality Act 2010 to ensure these groups are protected and are not discriminated against by school/college policy.

- Schools/colleges should remain aware that every pupil, victim or perpetrator, is entitled to an education and it is in the duty of the school/college to ensure that pupils' education is not adversely affected as a result of child-on-child abuse or any action taken in response to incidents.

4 Recognising child on child abuse

Bullying and other forms of harmful behaviour by children against their peers can range from low-level, problematic behaviour to abusive behaviour that can put victims at risk of significant harm.

Staff should be aware that pupils may not report incidents immediately or at all for a variety of reasons but must be proactive in recognising any child-on-child abuse taking place and take the view that it may be happening even if it is not apparent. Reports may be made by friends of the pupil on their behalf or staff may identify changes in behaviour that signal the pupil's distress and should be attentive to these signs.

It is important that professionals can recognise the form that child-on-child abuse can take, including the following:

- physical abuse including hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm to another person; threats of harm with a weapon;
- emotional abuse through bullying including name-calling, making threats, spreading rumours, verbal abuse or deliberate social exclusion;
- cyber bullying; the use of the internet and mobile devices to post threatening, intimidating or malicious messages/images on social media sites including those generated using AI eg; deepfakes; more information on this is available in the *model online safety policy for schools and colleges* available on the CSCP website.
- hazing; a form of initiation rite involving physically and/or emotionally abusive behaviour towards the person being initiated into a group, often as part of a "trial";
- relationship abuse; abuse within teenage intimate relationships that can involve physical and emotional abuse or threats and/or control or coercion and where the perpetrator tries to gain power over the victim; where the victim and perpetrator are both aged 16 or 17 the Domestic Abuse Act 2021 will apply and staff should refer to the CSCP guidance on domestic abuse available on the CSCP domestic abuse webpage;

- prejudice-based bullying or harassment linked to a child or young person's ethnicity, religion, disability or sexual orientation; staff should be aware of the heightened vulnerability of some groups to bullying and abuse based on discrimination;
- sexual violence, including sexual assault and sexual harassment including consensual and non-consensual sharing of nude images (see section 10);
- exploitation of peers through sexual exploitation or criminal exploitation on the county lines model for example (which may be linked to gang involvement).

5 Extra-familial harm and exploitation

Extra-familial harm describes the risks faced by young people arising from their peer group, school or community rather than the home environment. These risks include involvement in crime and drug use or gang membership and may involve their exploitation by their peers for example through sexual exploitation, criminal exploitation (such as county lines dealing) and serious youth violence.

Schools/colleges should consider incidents of child-on-child abuse in the context of extra-familial harm and be aware of the presence of exploitative relationships between the victim and perpetrator.

Further information can be found in the CSCP *Extra-familial harm and child exploitation* guidance available on the CSCP website:

6 Responding to incidents

Schools/colleges should have in place a system for allowing pupils to raise concerns and report incidents in confidence. Where possible, a named member of staff can be appointed, for example a head of year, although pupils may prefer to speak to a staff member whom they trust.

First responses are crucial as this can set the tone for what pupils will expect in terms of reports being taken seriously and acted on, which will in turn determine the extent to which pupils have trust in the school/college and will feel safe to come forward with concerns.

It is essential that where concerns and incidents may have involved harm to the victim, the designated safeguarding lead should be consulted in order to make an informed decision on whether a referral to social care is necessary.

The member of staff responding to the incident or concern should:

- gather all the facts, speaking to both the victim and perpetrator
- liaise with the designated safeguarding lead
- inform parents of the incident/concern (see section 14)
- carry out a risk assessment to see if there is any further risk to the victim or other pupils
- make a report of the incident including a decision on what actions will be taken by the school.

Where incidents involve material posted online, the school/college should request that the electronic device is handed over as part of the investigation and may use legal powers to search and confiscate property as set out in the statutory guidance S*earching, screening and confiscation advice for schools* available on the CSCP schools safeguarding webpage. Searching, screening and confiscation in schools - GOV.UK (www.gov.uk)

Further guidance is also available in the Camden *Schools* s*creening and searching guidance* available on the CSCP schools safeguarding policies webpage.

Where a referral will be made to Children's Safeguarding and Family Help (CSFH) or the police, the designated safeguarding lead will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents.

7 Levels of harm and intervention

Child on child abuse will cover a spectrum of behaviours involving different levels of harm and requiring different levels of intervention, and schools/colleges should take the following into account when deciding on how to deal with incidents:

- *Inappropriate behaviours*: one off incidents that involve a low-level breach of school/college policies where there is thoughtlessness rather than malice and which may not be aimed at a particular pupil; these may be dealt with internally under school behaviour policies with provision of pastoral care within the school to support any victim or the perpetrator.

- *Problematic behaviours*: on-going behaviours that are socially unacceptable involving some element of victimisation which may be opportunistic rather than deliberately targeted; the behaviour may raise concerns regarding the impact on the wellbeing of the victim and may imply that the perpetrator has unmet needs that are driving their behaviour; the school/college may deal

with the matter internally and/or consider a referral for an early help service for both the victim and perpetrator.

- *Harmful and abusive behaviours:* persistent behaviours that continue despite previous sanctions with evidence of harmful intent and victimisation, deliberate and pre-planned, targeted at specific pupils and leading to harm of the victim; the school/college may deal with the incident locally, perhaps involving the safer schools officer (where available) or consider making a referral for a social care response for both the victim and perpetrator, including a child protection response. The seriousness of the behaviour and the impact on the victim will determine which route is taken. Schools may consult with MASH if unsure. Where a criminal offence has taken place, the school/college should consider reporting the matter to the police.

The following factors should be taken into consideration when deciding on whether the behaviour is harmful:

- the behaviour is considered unacceptable or inappropriate for their peer group
- whether it is a single incident or a history of incidents and discernible patterns of behaviour or evidence of escalation is present
- there are specific concerns about the victim or the perpetrator, including any vulnerabilities
- there are elements of victimisation or discrimination on the basis of race, gender, sexuality etc in the behaviour
- there is evidence of coercion or pre-planning or the involvement of other pupils
- there is a power imbalance between the victim or perpetrator (for example age or developmental stage)
- the impact on the victim, particularly in the context of any vulnerabilities, for example SEND
- whether the behaviour involves a criminal offence (eg: rape/serious sexual assault).

8 Referral for social care services

- Schools/colleges should refer to their safeguarding and child protection policies when considering a referral for a social care service.
- Prior to any referral, the matter should be discussed with the designated safeguarding lead to decide whether this is the best course of action.

Schools/colleges may also contact the Contact Service practitioner for advice on a "no names" basis.

- All referrals for a social care service should be made to the Children and Families Contact Service.
- A referral must be made for both the victim and the perpetrator using an e-CAF referral and should contain as much information as possible.
- Urgent child protection referrals can be made by telephone but must be followed up in writing within 48 hours.

- If a child lives in another local authority area, the referral should be made to the home authority but Camden should be notified of the referral.
- Cases will be dealt with under MASH procedures and a decision made on whether to refer on for a Family Help service. Generally, the case will be referred on where there are concerns that the perpetrator may be a victim of abuse themselves or where the perpetrator presents a risk to other children.

On receipt of the referral, the Contact Service will consider the information and decide on the most appropriate response from the Family Help service:

- Where the victim or perpetrator requires a preventative, early help response to address inappropriate behaviours they will receive a **Targeted Early Help service.**
- Where the victim or perpetrator exhibit more complex needs, they will receive a **child in need statutory intervention**.
- If there are concerns that the victim is at risk of significant harm or the perpetrator is the victim of abuse, the case will be passed to the MASH team to gather relevant information and the case passed to **the Lead Child Protection Practitioner** to consider a **child protection response.**
- Child protection cases will be dealt with under the *Harmful Behaviour* procedures of the London Safeguarding Children Board procedures and a strategy meeting will be convened within 3-5 working days.
  PG22. Harmful Behaviour (londonsafeguardingchildrenprocedures.co.uk)

9 Reporting to the police

Schools/colleges should report incidents to the police where it is believed a criminal offence may have taken place; this decision should be taken by the designated safeguarding lead who should follow the guidance for schools and colleges on when to call the police.
when-to-call-the-police--guidance-for-schools-and-colleges.pdf (npcc.police.uk)

Cases that are referred to CSFH for a social care service will also be referred to the police and CSFH will liaise with the police Child Abuse Investigation Team (CAIT) who will attend any strategy meeting.

The police will be responsible for investigating any criminal offence and will set any bail conditions, but it is likely that perpetrators will be released under investigation. Schools/colleges will therefore need to consider what arrangements should be in place to manage risks (see section 11).

The designated safeguarding lead should liaise with the police and CSFH with regard to the progress of any criminal proceedings and ensure the school/college have contingency plans in place following the outcome of the case.

10 Dealing with incidents of sexual violence or harassment

The following are additional to the procedures set out in sections 6, 8 and 9 which should also be followed when dealing with incidents of sexual violence and harassment. When dealing with incidents of sexual harassment and sexual violence, schools/colleges should be mindful that positive responses to disclosures is likely to encourage more openness and support other victims to come forward.

Schools/colleges should follow Part 5 of *Keeping children safe in education (2026)* when dealing with incidents of sexual violence or sexual harassment. The following procedures are based on these documents.

10.1 Harmful sexual behaviour

Sexual harassment and violence are part of a spectrum of harmful sexual behaviours and which indicate that a child is exhibiting sexual behaviours that are outside societal norms and the expected behaviours for their age and stage of development. Further information on harmful sexual behaviours can be found in the CSCP *Harmful Sexual Behaviour* guidance available on the CSCP webpage.

Schools need to be mindful of children who exhibit harmful sexual behaviour, particularly in the context of sexual harassment and sexual violence in schools. Often minor incidents of inappropriate behaviour can escalate to more harmful and abusive behaviours if there are no preventative measures or early inventions.

10.2 Legal framework

Schools/colleges should ensure staff have an understanding of the specific criminal offences under the Sexual Offences Act 2003 and the importance of consent, in particular whether consent to sexual acts is given freely by someone with the capacity to choose and in the absence of any duress or exploitation.

- Sexual violence is defined as any act which is an offence under the Sexual Offences Act 2003. See appendix 1 for further details.

- Sexual harassment is defined as unwanted sexual conduct likely to violate the victim's dignity and/or make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment. This includes making sexual comments or jokes, physical contact such as touching or interfering with clothing or displaying sexual images. It also includes online harassment such as sharing unwanted comments and images, sexual threats and coercing others to share images of themselves online.

10.3 Prevention

Schools/colleges should aim to prevent sexual violence and harassment by:

- ensuring there are procedures in place agreed with Camden police and Camden council on how incidents involving sexual violence and harassment will be deal with;
- ensuring the designated safeguarding lead is aware of local support available for victims and perpetrators;
- teaching the statutory requirements of Relationships, Sex and Health Education in secondary schools and statutory Relationships and Health Education in primary schools, through PSHE;
- recognising the escalatory nature of misogyny and the benefits of early identification to support the whole-school approach to minimising the risk of HSB.

In primary schools, this will include:

  - respecting others, including online
  - appropriate boundaries in friendships with peers and others, including online
  - different types of bullying and how to get help
  - stereotyping and its impact
  - importance of permission-seeking and giving in relationships with friends, peers and adults
  - how to ask for advice or help and report concerns or abuse.

- In secondary schools this will include:
  - healthy and respectful relationships
  - boundaries and consent
  - stereotyping, prejudice and equality
  - body confidence and self-esteem
  - how to recognise an abusive relationship, including coercive and controlling behaviour
  - the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
  - what constitutes sexual harassment and sexual violence and why these are always unacceptable
  - different types of bullying and how and where to get help.

10.4 Recognition and response

Experiencing sexual violence or harassment is extremely distressing and it is crucial that schools/colleges deal with these incidents in a sensitive manner given the highly personal nature of the abuse and harm and the fact that the perpetrator may continue to attend the same school/college.

As victims may be reluctant to come forward it is important schools/colleges ensure procedures are in place that enable pupils to disclosure in confidence.
Schools/colleges should also be aware of children who are unable to verbalise their experience and who may signal distress through their behaviour.

Schools/colleges should also be aware of those pupils who face additional barriers to reporting incidents due to their vulnerability, for example pupils with SEND and LGBT pupils.

It is likely the school/college may hear second-hand reports of incidents, some of which may have taken place outside of school involving pupils or that have happened online. The school/college should actively investigate these reports rather than wait for a formal disclosure to be made.

Reported incidents should be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the school/college environment.

A report should be written of the incident and investigation covering the following:

- details of the incident and whether it constitutes harmful sexual behaviour
- the ages and stages of development of the pupils involved
- any power imbalances between the victim and perpetrator
- whether it is a one-off incident or part of a series of incidents
- whether other forms of abuse, for example physical abuse, have also taken place
- whether the abuse has taken place within an intimate personal relationship between the pupils involved
- details of what action will be taken by the school/college.

Staff dealing with disclosures should ensure the pupil's wishes and feelings on what action is taken are taken into account, but it should be made clear to the pupil that in some cases the school must take any action necessary to safeguard all pupils.

Schools/colleges should also be mindful of dealing with cases where investigation shows that the concerns raised are unsubstantiated, unfounded or malicious. It is important that the designated safeguarding lead keeps these incidents under review and considers whether any pupil making the allegation has unmet needs and what help they may require. Malicious allegations should be dealt with under school/college behaviour policies.

10.5 Levels of harm and intervention

All incidents should be considered within the context of harmful sexual behaviour:

- **Inappropriate sexual behaviour** involves single instances of sexual behaviour that is in breach of school/college behaviour policies but with no continuing risk to other pupils, for example inappropriate language or touching. These behaviours must be challenged and incidents may be dealt with internally under school/college policies with support provided to the victim and perpetrator via school/college pastoral care.

- **Problematic sexual behaviour** involves ongoing behaviour that may involve victimisation and that may be harmful to the victim and raises concerns about the welfare of the perpetrator. Examples of behaviours include sexualised language and invasive touching, exposing themselves, sending nude images or AI generated images. In these cases the school/college may deal with the matter

internally and/or consider a referral for early help service for both the victim and perpetrator.

- **Harmful/abusive sexual behaviour** involves victimisation that includes an element of coercion or manipulation or circumstances involving a power imbalance where the victim is not able to give informed consent and where the behaviour could cause physical or emotional harm. Coercion may be based on power imbalances due to differences in age, intellectual ability or physical strength. It may involve a sexual act against the victim in an aggressive, exploitative or threatening manner and in some cases may constitute a criminal offence. In these cases the school/college may consider making a referral for a social care service for both the victim and perpetrator, including a child protection response. Where a criminal offence has taken place, the school/college should consider reporting the matter to the police.

When dealing with incidents the designated safeguarding lead should be responsible for deciding on the school/college response including making referrals to CSFH or reporting incidents to the police.

11 Managing risks

Schools/colleges should take any necessary action to continue to safeguard the victim and other pupils within the school/college environment based on the level of risk established from the risk assessment, and this should include any risks to the perpetrator.

These decisions will be reviewed in the light of any on-going police and CSFH investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator. Action to protect the victim and other pupils must be carried out immediately regardless of the status of any police investigation.

Schools/colleges must give careful thought to the day-to-day management of risk and support for the victim, particularly in cases involving sexual violence and harassment, such as decisions on practical issues such as the victim and perpetrator sharing classrooms.

When making these decisions, the school/college should take into account the victim's views. However schools/colleges must be able to justify any measures taken and that they do not interfere with the educational opportunities of either party.

Schools/colleges may consider drawing up a safety plan that sets out actions to be taken by the school/college to minimise risk, keep the victim safe, ensure the school environment is a safe space and address the perpetrator's behaviour. The plan should be agreed with the victim and the perpetrator and should allow them both to continue school life as normal and should be kept under review by the designated safeguarding lead.

Examples of actions that could be included in the plan are:

- an assessment of risk (times, locations etc)
- details of sources of support available for the victim and perpetrator (within the school and externally)
- name of a trusted adult to whom the victim can report
- measures the school have put in place to keep the victim safe/separate from the perpetrator
- any agreements on behaviour by the perpetrator
- any restorative actions to be taken
- any action the school/college will make regarding the learning environment, policies etc
- what happens if there are further incidents or concerns escalate.

The designated safeguarding lead should:

- review responses to allegations on a regular basis to ensure progress on agreed actions;
- review the safety plan in order to continue to protect the victim;
- review school/college policies in the light of incidents to ensure they continue to keep all pupils safe;
- review incidents to establish if there are any patterns of problematic behaviour or wider cultural issues within the school that are driving problematic behaviour.

12 Confidentiality and information-sharing

The Children Act 2004 provides a legal basis for agencies to share information with other agencies in order to safeguard and promote the welfare of children when taking action in response to child on child abuse.

It is likely that victims will ask that information is not shared about their experiences but it is not possible for schools/colleges to promise confidentiality. It must be explained to victims that the school/college's safeguarding duty means information

may need to be shared with others to protect and support the victim and other pupils. However schools/colleges should be clear with victims what information will be shared, with whom and why it is necessary and only share information with agencies who need to know.

Although schools and colleges should try to get parental agreement to making any referrals, victims, perpetrators and parents should be informed that consent is not needed and if it is withheld the referral will go ahead.

Parents should be informed of any incidents unless this would:

- place the child or young person at further risk
- interfere with a criminal investigation
- cause undue delay to safeguarding a child or young person.

Within schools, information sharing should be limited to the head teacher and the designated safeguarding lead and any member of staff involved in responding to the incident or involved in managing risk and implementing the safety plan. Decisions on disclosure should be made by the head teacher on a case-by-case basis.

Anonymity should be given to victims and alleged perpetrators whilst allegations are being progressed through the criminal justice system and the school/college must make all reasonable efforts to uphold this.

13 Working with parents

Schools and colleges should inform the parents of victims and perpetrators as proportionate to the level of harm caused unless this may put the child at risk of further harm. The designated safeguarding lead should meet with parents to explain arrangements that will be put in place to keep victims safe and support both pupils, as well

Staff should ensure a high level of sensitivity when working with parents. Many parents are likely to be shocked on hearing about the allegations, but it is important that they are involved in agreeing any action to support the perpetrator to take responsibility and to manage behaviour.

However, professionals also need to be aware of the possibility that the quality of care provided by parents and the home environment may be a factor in the child's harmful sexual behaviour. Where this is thought to be the case, professionals should discuss the matter with the Contact Service practitioner to discuss a referral.

Appendix 1: **Sexual Offences Act 2003**

The Sexual Offences Act 2003 sets out the law regarding the following sexual offences:

- Rape
- Assault by penetration
- Sexual assault
- Causing someone to engage in sexual activity without consent.

Full details can be found on the Crown Prosecution Service website at:
Rape and Sexual Offences - Chapter 7: Key Legislation and Offences | The Crown Prosecution Service (cps.gov.uk)

The Act also sets out the law regarding the age of consent for sexual activity. Consent must be freely given by someone who has the capacity to give consent. Any consent given under circumstances suggesting force, duress, coercion or exploitation may be void. For children, the question of whether they are competent to consent to sexual activity will be dependent on their age.

- The age of consent for sexual activity is 16.

- Children under 13 cannot give informed consent to any form of sexual activity in any circumstances and any sexual activity with a child under 13 will be an offence.

  - Young people aged between 13 and 15 cannot consent to sexual activity but cases involving teenagers of a similar age who mutually agree to sex may not involve prosecution. The question will be whether consent was obtained through force, duress or coercion and in the context of an exploitative relationship.

  - Young people aged 16 and 17 can consent to sexual activity but this may be rebutted by any evidence of duress or of an exploitative relationship or any power imbalance including abuse of a position of trust. Positions of trust include those who coach, teach, train, supervise or instruct children on a regular basis.