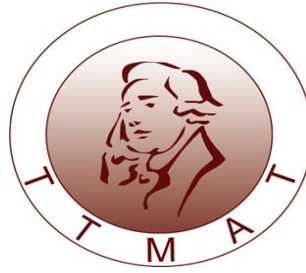
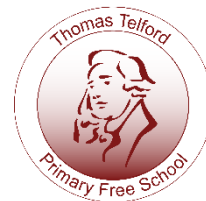


Thomas Telford Multi Schools Trust



Child on Child Abuse Policy

**Redhill Primary Academy
and
Thomas Telford Primary Free School**



Signed

**Mrs Raj Samra
Chair of Governors
September 2026**

Introduction

The schools recognise that children are vulnerable to and capable of abusing their peers. We take such abuse as seriously as abuse perpetrated by an adult. This includes verbal as well as physical abuse. Child-on-child abuse will not be tolerated or passed off as part of “banter”, “just having a laugh” or “growing up”.

This policy applies to governors, the senior leadership team, and all staff (which term shall apply to all volunteer staff members) at the schools. The schools are committed to the prevention, early identification, and appropriate management of child-on-child abuse (as defined below) both within and beyond the schools.

In cases where child-on-child abuse is identified, we will follow our child protection procedures, taking a contextual approach to support all children and young people who have been affected by the situation.

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

- bullying
- discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- serious violence, including violence associated with gangs, county lines, knife crime, assault, robbery, and violence involving weapons
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- consensual and non-consensual sharing of nude and semi-nude images and videos (sometimes referred to as sexting or youth-produced sexual imagery)
- technology-facilitated abuse, including cyberbullying, online harassment, image-based abuse, sextortion, peer grooming and doxxing
- AI-enabled abuse, including deepfakes, nudification technology, manipulated imagery and synthetic content used to humiliate, threaten or exploit another child
- initiation/hazing type violence and rituals
- sexual exploitation
- criminal exploitation

Some of these behaviours will need to be handled with reference to other policies in school such as the relationships and behaviour policy, child protection policy and online safety policy.

This policy is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (September 2026).

Policy development

This policy:

- is the schools' overarching policy for any issue that could constitute child-on-child abuse. It relates to, and should be read alongside, the schools' child protection policy and any other relevant policies including, but not limited to, online safety, IT use, data protection and retention of records, children missing in education, child behaviour and discipline, exclusions, and (where relevant) weapons;
- sets out our strategy for improving prevention, and identifying and appropriately managing child-on-child abuse;
- it is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which children are or may be exposed.
- recognises that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up';
- does not use the term 'victim' and/or 'perpetrator'. This is because our schools take a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers;
- uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. Although the starting point is that the schools' response to child-on-child abuse should be the same for all children, regardless of age, there may be some different considerations in relation to, for example, a child aged under 7, or a child aged 11;
- uses the terms 'boy(s)', 'girl(s)', which means a child/children whose biological sex is male and female respectively, as well as trans boys and trans girls, whose gender identity will be different from their biological sex. It is acknowledged that there will also be some children who identify as non-binary or gender fluid and who will not recognise the term boy or girl in respect to themselves.
- similarly, the schools' response to incidents involving the exchange of youth involved sexual imagery will need to differ depending on the age of the children involved;
- should, if relevant, according to the concern(s) or allegation(s) raised, be read in conjunction with the DfE's advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE's Advice) (May 2018), and any other advice and guidance referred to within it, as appropriate; and
- should be read in conjunction with the Telford and Wrekin Partnership Safeguarding Policy and Procedures.

Staff Responsibilities

All staff have a responsibility to safeguard and promote the welfare of children and contribute to a whole-school culture of safeguarding.

All staff will:

- Maintain an attitude of "it could happen here".
- Never dismiss harmful behaviour as banter, horseplay, friendship issues or part of growing up.

- Challenge inappropriate language, prejudice, sexualised behaviour, misogyny, discriminatory language and harmful attitudes.
- Maintain professional curiosity where concerns arise.
- Be alert to indicators of abuse including changes in behaviour, attendance, emotional wellbeing, friendship groups and online activity.
- Record concerns promptly and accurately on a cause for concern form.
- Report concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.
- Understand that child-on-child abuse may occur online or offline.
- Promote respectful relationships, equality, consent, inclusion and online safety through everyday practice.
- Recognise that technology, social media, artificial intelligence and digital platforms may be used to facilitate abuse.

Understanding child-on-child abuse

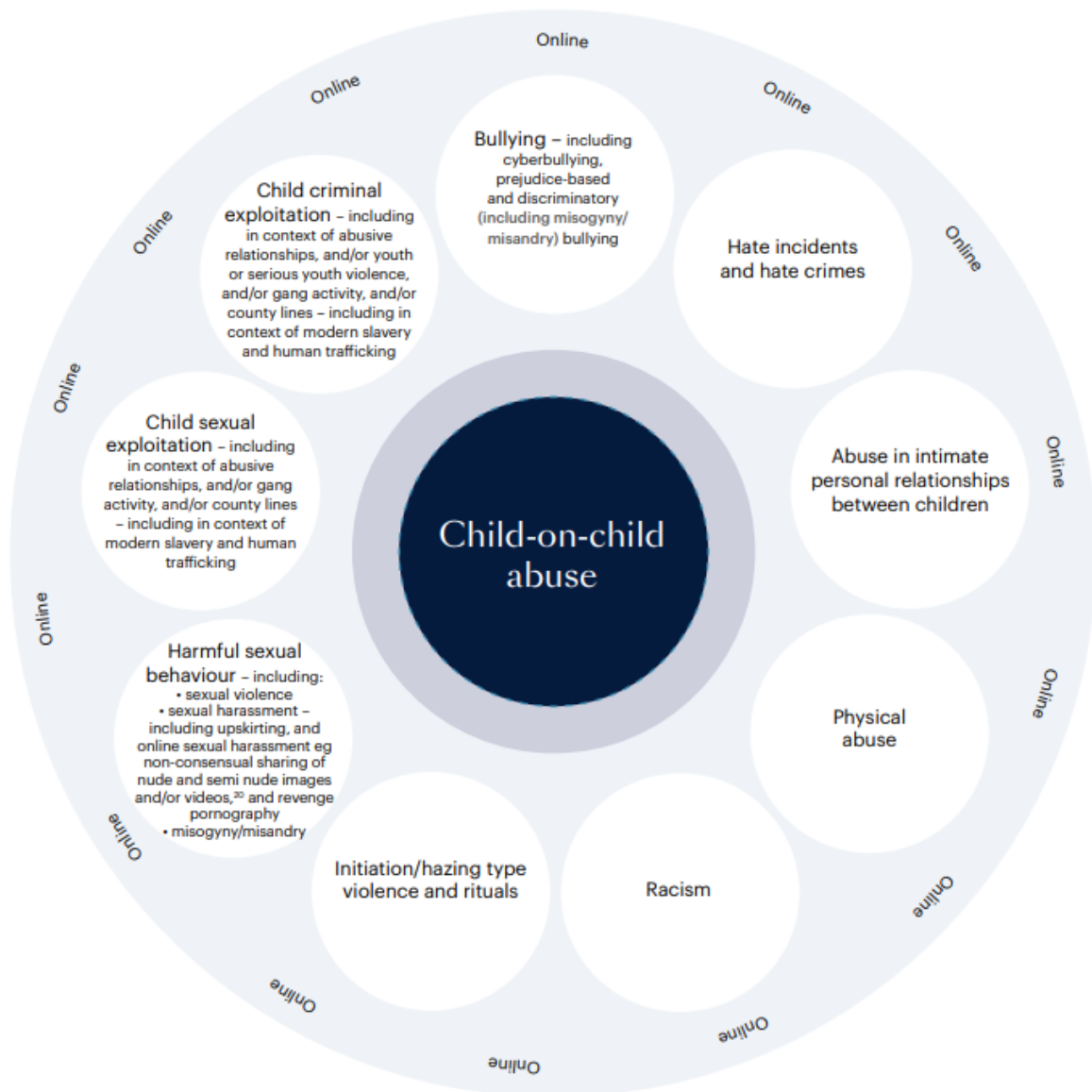
Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, and within children's relationships (both intimate and non-intimate), friendships and wider peer associations.

Child-on-child abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, child criminal exploitation, youth and serious youth violence, harmful sexual behaviour, and/or prejudice-based violence including, but not limited to, gender-based violence.

Examples of online child-on-child abuse would include sharing nude and semi-nude images and/or videos, online abuse, child-on-child grooming, the distribution of youth involved sexualised content, and harassment.

Sexual violence and sexual harassment can occur between two children of any age and sex or a group of children sexually assaulting or sexually harassing a single child or group of children. The impact of this behaviour on children can be very distressing and have an impact on academic achievement and emotional health and wellbeing. Sexual harassment and sexual violence may also occur online and offline.

Overview of child-on-child abuse (taken from [addressing-child-on-child-abuse.pdf](https://www.farrer.co.uk/files/addressing-child-on-child-abuse.pdf) (farrer.co.uk))



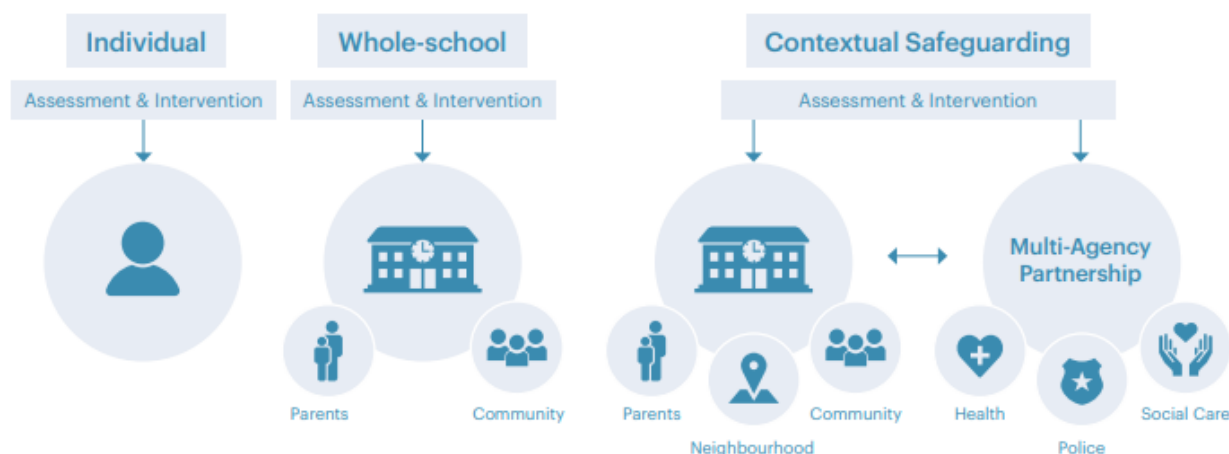
The context

This policy:

- encapsulates a contextual safeguarding approach, which is about changing the way that professionals approach child protection when risks occur outside of the family, thereby requiring all those within the Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children may have encountered child-on-child abuse.
- adopts a whole-school community Contextual Safeguarding approach, which means:
 - being aware of and seeking to understand the impact that these wider social contexts may be having on the schools' children;
 - creating a safe culture in the schools by, for example, implementing policies and procedures that address child-on-child abuse and harmful attitudes;

- promoting healthy relationships and attitudes to gender/ sexuality;
- hotspot mapping to identify risky areas in the schools;
- training on potential bias and stereotyped assumptions,
- being alert to and monitoring changes in a child's behaviour and/or attendance; and
- contributing to local child protection agendas by, for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies.

Contextual safeguarding approach (taken from [addressing-child-on-child-abuse.pdf](https://www.farrer.co.uk/addressing-child-on-child-abuse.pdf) (farrer.co.uk))



All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it. In this policy, we recognise the importance of distinguishing between problematic and abusive **sexual behaviour** (Harmful Sexual Behaviour HSB).

We are adopting the NSPCC definition of 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."

We will also use Simon Hackett's continuum model to demonstrate the range of sexual behaviours (Appendix 1) and the Brook Traffic Lights (Appendix 2). Hackett's continuum relates exclusively to sexual behaviours and is not exhaustive. The Brook Sexual Behaviours Traffic Light Tool can help professionals working with children to distinguish between three levels of sexual behaviour – green, amber and red, and to respond according to the level of concern.

Other behaviour

When dealing with other alleged behaviour, which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable,
- involves a single incident or has occurred over a period of time,
- is socially acceptable within the peer group,
- 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 and the child/children allegedly the subject of that power, and
- involves a misuse of power.

How can a child who is being abused by their peers be identified?

All staff should be alert to the well-being of children and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

The schools' safeguarding teams should regularly review behaviour incident logs, which can help to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

Staff should be alert to indicators of emotional wellbeing or mental health needs which may arise as a result of child-on-child abuse. These may include changes in attendance, presentation, behaviour, relationships, confidence, concentration, anxiety or emotional regulation.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.

Research suggests that:

- Changes in attendance patterns, persistent absence or sudden disengagement from school may indicate that a child is experiencing child-on-child abuse or other safeguarding concerns.
- Child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up.
- Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of child-on-child abuse within their settings and recognise that these will play out differently in single sex, mixed or gender- imbalanced environments.
- Children who are lesbian, gay, bi or trans (LGBT) can be targeted by their peers and in some cases, a child who is perceived by their peers to be LGBT can be just as vulnerable.
- Children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND,⁶⁰ and additional

barriers can sometimes exist when recognising abuse in children with SEND. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration;
- the potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs;
- communication barriers and difficulties, and overcoming these barriers;
- some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs.

The schools recognise that some children may face additional barriers to recognising abuse, reporting concerns or accessing support.

Additional consideration will be given to:

- children with special educational needs
- looked-after and previously looked-after children
- children in kinship care
- young carers
- children affected by domestic abuse
- children experiencing mental health difficulties
- LGBTQ+ children
- children questioning their gender
- children affected by exploitation
- children from minority ethnic backgrounds

Additional safeguarding support may be implemented where appropriate.

Any reports of abuse involving children with SEND will therefore involve close liaison with the DSL and the SENCo (who is a deputy DSL).

All staff are expected to maintain professional curiosity.

Child-on-child abuse may present through:

- behavioural changes
- friendship changes
- attendance concerns
- emotional distress
- anxiety
- withdrawn presentation
- unexplained injuries
- online behaviours
- disclosures from third parties

Staff should never rely solely upon a direct disclosure and should always discuss concerns with the DSL where indicators of abuse are present.

Responding to alleged incidents responding to reports of sexual violence and sexual harassment

General principles

Even though we work incredibly hard to prevent all types of child-on-child abuse, all staff, across both schools, know that it can and does happen here. We will deal with every incident where there is an intent to cause harm. It is essential that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately (with due regard to the children's age and/or developmental stage) and promptly. This may mean that not all cases will result in a behaviour sanction for the child who is alleged to have caused harm. We will support and recognise all children involved ensuring that they continue to have a right to education and a right to be safeguarded from further harm.

Any response should:

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation;
- treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children; she/he may also have considerable unmet needs and be at risk of harm themselves. The schools should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter, take into account:
 - that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider sociocultural contexts – such as the child's/ children's peer group (both within and outside the schools); the family; the school environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child/children's needs and to mitigate risk; and
 - the potential complexity of child-on-child abuse and of children's experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting;
 - the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents, and obtain consent to any referral before it is made. The schools should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

The schools recognise that children affected by child-on-child abuse, whether they have experienced harm or are alleged to have caused harm, may require mental health and

emotional wellbeing support. Appropriate support and referrals will be considered where necessary, including access to pastoral support, family help services, CAMHS or other specialist services.

What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

The member of staff should discuss their concern with the DSL without delay (in accordance with pages 7-9 of the child protection policy) so that a course of action can be agreed. The DSL will discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedures set out in pages 6-9 of the child protection policy.

In relation to sharing nude and semi-nude images and/or videos, the schools will where necessary, consult with guidance produced by The UK Council for Child Internet Safety (UKCCIS) Education Group Sexting in Schools and Colleges and DfE guidance Searching, screening and confiscation. The DSL (or deputy) will take the lead on these issues and will work closely alongside our Online Safety leader.

Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL, alongside the Online Safety leader, should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy to seek specialist help in preventing the images spreading further and removing the images from the internet.

The Internet Watch Foundation (IWF), for example, has a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police.

DSLs should always use their professional judgement to consider:

- the nature and seriousness of the alleged behaviour.
- whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with Family Connect on a no-names basis (where possible) to determine the most appropriate response.
- 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 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 or the Schoolstaff, and other related issues and wider context?

Options to manage the abuse

1. Manage internally. In some cases, for example, one-off incidents, we may decide that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing pastoral support. This decision will be made based on the principle that child-on-child abuse is never acceptable and will not be tolerated. All decisions, and discussions around making these decisions will be recorded and stored (by the Designated Safeguarding Lead and placed on CPOMS).

2. In line with 1 above, we may decide that the children involved do not require statutory interventions but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address nonviolent harmful sexual behaviour and may prevent escalation of sexual violence. These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, a specialist harmful sexual behaviour team, CAMHS and/or youth offending services.

3. Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to Family Connect following locally agreed protocols. Where statutory assessments are appropriate, the designated safeguarding lead or a deputy will be working alongside, and cooperating with, 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. As a matter of best practice, if an incident of child-on-child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the school will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.

4. Report alleged criminal behaviour to the police. Alleged criminal behaviour will ordinarily be reported to the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police. For example, where the exchange of youth involved sexual imagery does not involve any aggravating factors. All concerns or allegations will be assessed on a case-by-case basis.

Risk Assessment

When there has been a report of sexual violence, the DSL (or a deputy) will make an immediate risk and needs' assessment (see Appendix 5). Where there has been a

report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

Risk assessments will be recorded (written or electronic and uploaded onto CPOMS) and be kept under review. It may be appropriate to contact children's social care and/or police to assist in carrying out a safety plan. The DSL may use and consider the [TWSP Sexually harmful behaviour - risk assessment tool](#).

Record Keeping and Monitoring

All child-on-child abuse concerns will be recorded promptly on CPOMS.

Records will include:

- concerns raised
- actions taken
- decisions reached
- rationale for decisions made
- risk assessments
- referrals
- outcomes

The DSL team will regularly analyse safeguarding records to identify:

- trends
- recurring themes
- vulnerable groups
- locations
- times of increased risk
- staff training needs
- curriculum priorities

This analysis will inform safeguarding practice, preventative education and governor oversight.

Actions to consider during the investigation and post investigation

Whilst the schools establish the facts of the case and starts, where applicable, the process of liaising with children's social care and the police, the alleged perpetrator may be removed from any classes they share with the alleged victim. We will consider how best to keep the alleged victim and alleged perpetrator a reasonable distance apart on school premises. These actions are in the best interests of both children and should not

be perceived to be a judgment on the guilt of the alleged perpetrator. We understand that all children have a right to education.

Reporting to the Police

Any report to the police will generally be made through Family Connect as above. The designated safeguarding lead (and their deputies) will follow local processes for referrals.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is this will be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

Where a report has been made to the police, the school will consult the police and agree what information can be disclosed to staff and others, the alleged perpetrator and their parents or carers. They will also discuss the best way to protect the victim and their anonymity.

Where there is a criminal investigation, we will work closely with the relevant agencies to support all children involved (especially potential witnesses). Where required, advice from the police will be sought in order to help us. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator, we will work closely with the police (and other agencies as required), to ensure any actions the school takes do not jeopardise the police investigation.

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 our behaviour policy. If the perpetrator remains in the school we will be very clear as to our expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions we think 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 children in the school. We will ensure all children involved are protected, especially from any bullying or harassment (including 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, we 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. We will continue to support all parties in this instance.

Support for children affected by sexual assault

Support for victims of sexual assault is available from a variety of agencies (see Appendix 3). We will support the victim of sexual assault to remain in school but if they are unable to do so we will enable them to continue their education elsewhere.

This decision will be made only at the request of the child and their family. If they are moved, we will ensure the new school is aware of the ongoing support they may need. The DSL will support this move.

Where there is a criminal investigation, the alleged perpetrator will be removed from any shared classes with the victim, and we will keep them a reasonable distance apart on the school premises. This is in the best interest of the children concerned and should not be perceived to be a judgement of guilt before any legal proceedings.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, we may take suitable action, if we have not already done so. 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 would seriously harm the education or welfare of the victim (and potentially other children). Where a criminal investigation into sexual assault leads to a conviction or caution, we may, if we have not already done so, consider any suitable sanctions using our behaviour policy, including consideration of permanent exclusion.

Where the perpetrator is going to remain at the school, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator. Appropriate support will be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis.

The above will be considered with the needs and wishes of the victim at the heart of the process (supported by parents as required).

Physical abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from child to child can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police. The principles from our relationships and behaviour policy will be applied in these cases, with recognition that any police investigation will need to take priority.

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum (Appendix 1) to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable
- 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 or a misuse of power

Online behaviour

Many forms of child-on-child abuse have an element of online behaviour including behaviours such as cyberbullying and the creation, sharing or manipulation of images using artificial intelligence, including deepfakes, nudification applications and other digitally altered content. Policies and procedures concerning this type of behaviour can be found in our Relationships and Behaviour Policy, Online Safety Policy, and Child Protection Policy.

The schools recognise the emerging safeguarding risks associated with artificial intelligence and digitally manipulated content.

This may include:

- AI-generated sexual images
- deepfake imagery
- nudification applications
- manipulated photographs
- synthetic media used to bully, harass, threaten or exploit another child

The creation, possession or sharing of such material involving children will be treated as a serious safeguarding concern.

Where appropriate, referrals may be made to:

- Family Connect
- Children's Social Care
- West Mercia Police
- specialist safeguarding agencies

Staff training and pupil education will reflect emerging technological risks and developments.

Filtering and Monitoring

The schools maintain appropriate filtering and monitoring systems to help safeguard pupils when using school technology.

These systems help to:

- prevent access to harmful content
- identify safeguarding concerns
- identify patterns of harmful behaviour
- support early intervention
- respond to emerging online risks

Filtering and monitoring arrangements are reviewed regularly by leaders and governors to ensure they remain effective and proportionate.

Prevention

Our schools, actively seeks to raise awareness of and prevent all forms of child-on-child abuse by:

- Educating all governors, staff and volunteers, and parents about this issue. This will include training all governors, staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes:
 - contextual safeguarding;
 - the identification and classification of specific behaviours; and
 - the importance of taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing.
- Educating children about the nature and prevalence of child-on-child abuse via PSHE and the wider curriculum.
- Children are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.
- They are regularly informed about the schools' approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.
- Engaging parents on this issue by:
 - Talking about it with parents, both in groups and one to one.
 - Asking parents what they perceive to be the risks facing their child and how they would like to see the school address those risks.
 - Involving parents in the review of school policies and lesson plans.
 - Encouraging parents to hold the school to account on this issue.
- Ensuring that all child-on-child abuse issues are fed back to the schools' DSL so that they can spot and address any concerning trends and identify children who maybe in need of additional support. This is done by way of a weekly staff meeting at which all concerns about children (including child-on-child abuse issues) are discussed.
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom). The schools recognise that harmful attitudes towards women and girls, including misogyny, sexist language, gender stereotyping and sexualised bullying, can contribute to abusive behaviours. Through the curriculum and wider school culture we actively promote respect, equality and healthy relationships.
- Working with governors, TTMAT, the senior leadership team, all staff and volunteers, children and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community.

- Creating conditions in which our children can aspire to and realise safe and healthy relationships.
- Creating a culture in which our children feel able to share their concerns openly, in a non-judgmental environment, and have them listened to.
- Responding to cases of child-on-child abuse proportionately, promptly and appropriately.

Partnership with Parents and Carers

The schools recognise that safeguarding children is most effective when schools and families work together.

The schools will:

- provide safeguarding information for parents and carers
- share information regarding emerging online risks
- offer online safety guidance
- support families following incidents of child-on-child abuse
- signpost families to appropriate safeguarding resources and support services

Parents and carers are encouraged to report safeguarding concerns promptly so that support and intervention can be provided at the earliest opportunity.

Monitoring and Review

This policy will be reviewed annually by governors and the safeguarding team, or sooner if:

- legislation changes
- Keeping Children Safe in Education is updated
 - local safeguarding procedures change
- lessons are learned from safeguarding incidents
- emerging safeguarding risks are identified

Safeguarding data relating to child-on-child abuse will be reviewed regularly to identify trends, vulnerable groups and training needs.

Findings will be reported through safeguarding reports to governors.

Appendix 1

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:

Normal	Inappropriate	Problematic	Abusive	Violent
Developmentally expected	• Single instances of inappropriate sexual behaviour	• Problematic and concerning behaviours	• Victimising intent or outcome	• Physically violent sexual abuse
Socially acceptable	• Socially acceptable behaviour within peer group	• Developmentally unusual and socially unexpected	• Includes misuse of power	• Highly intrusive
Consensual, mutual, reciprocal	• Context for behaviour may be inappropriate	• No overt elements of victimisation	• Coercion and force to ensure victim compliance	• Instrumental violence which is physiologically and/or sexually arousing to the perpetrator
Shared decision making	• Generally consensual and reciprocal	• Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity	• Intrusive • Informed consent lacking, or not able to be freely given by victim • May include elements of expressive violence	• Sadism

<https://learning.nspcc.org.uk/research-resources/2016/harmful-sexual-behaviour-framework>

Appendix 2

Brook sexual behaviours traffic light tool

IDENTIFY

What is the behaviour?

Sexual development is influenced by many factors.

The environment in which children grow, develop and interact has a significant influence on their knowledge, attitudes and behaviours. When using Traffic Lights® to establish whether children or young people's sexual behaviour is typical and developmentally appropriate, problematic or harmful, it is necessary to consider the current social, cultural and family context.

Use Traffic Lights® to identify the characteristics of the behaviour and the way it occurs and then follow steps 2 and 3 to understand and respond. All green, orange and red light behaviours require some level of information, support and protective response.

UNDERSTAND

What is the behaviour communicating?

All behaviour communicates. Once you have identified a behaviour, it is important to explore and understand the context before responding.

Children and young people show their needs and wants through their behaviours. Understanding the reasons for a child or young person's sexual behaviour is important so adults can support healthy sexual development and provide appropriate information and support.

When sexual behaviours are typical and developmentally appropriate they are usually part of natural curiosity and making sense of the world.

However, when sexual behaviours are identified as problematic or harmful, it is essential to think about why the child or young person may be exhibiting the behaviour. The child or young person may not have the language, experience or ability to seek help.

What might the behaviour indicate?

Examples include:

- Curiosity
- It feels good
- Learning about privacy
- Learning about touch and social rules
- Exploring sexual identity and gender roles
- Experiencing feelings of sexual attraction
- Lack of age and developmentally appropriate sexuality information
- Possible grooming, child sexual exploitation
- Exposure to explicit sexual activity including online content
- Experience of physical, emotional or sexual abuse or neglect

RESPOND

What response will meet the child or young person's needs?

All behaviour has a function. When adults understand why the behaviour may be happening, they can respond by helping to meet the needs of the child or young person in effective ways.

Behaviour usually reflects a range of needs and all sexual behaviours require a response, even those identified as developmentally appropriate (green light behaviours).

The type of response will depend on what is motivating the behaviour, what the behaviour might be communicating and the severity of the behaviour.

When children or young people's sexual behaviour is problematic or harmful a range of strategies may be needed to respond effectively.

AGE GROUP 0-4 YEARS

GREEN LIGHT BEHAVIOURS ARE SEXUAL BEHAVIOURS THAT ARE TYPICAL AND DEVELOPMENTALLY APPROPRIATE. EXPRESSING SEXUALITY THROUGH SEXUAL BEHAVIOUR IS NATURAL, HEALTHY AND A PART OF GROWING UP.

Green light behaviours are:

- Spontaneous, curious, light hearted, easily diverted, enjoyable, mutual and consensual
- Appropriate to the child's age and/or stage of development
- Activities or play among equals in terms of age, size and ability levels
- About understanding and gathering information, balanced with curiosity about other parts of life

Green light behaviours provide opportunities to **talk**, **explain** and **provide support**.

Example green light behaviours for a developmental age of 0-4 years include:

- Comfortable being nude
- Body touching and holding own genitals
- Unselfconscious masturbation
- Interest in body parts and functions
- Wanting to touch familiar children's genitals during play, toilet or bath times
- Participation in games involving looking at and/or touching the bodies of familiar children e.g. "show me yours and I'll show you mine"
- Asking about or wanting to touch the breasts, bottoms or genitals of familiar adults e.g. when in the bath or shower
- Supervised online communication with family or known peers

WHAT CAN YOU DO?

Green light behaviours provide an opportunity to positively reinforce appropriate behaviour, and to provide further information, explanations, and support.

All children and young people have the right to relationships and sex education which equips them with the information and skills they need to form healthy and positive relationships and to help keep them safe. We can support the child/young person's natural curiosity by talking and providing explanations about healthy sexual behaviours that are age and stage appropriate to their learning.

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

I am not a professional working with young people. Where can I go for help?

If you are not a professional working within an organisation with internal procedures or frameworks, you may want to consider contacting a specialist organisation that can advise you. These include:

- **Police services:** Call 999 if the child is at immediate risk, or call the police on 101 if you think a crime has been committed
- [NSPCC](https://www.nspcc.org.uk): 0808 800 5000
- [Childline](https://www.childline.org.uk): 0800 1111
- [Child Exploitation and Online Protection Centre \(CEOP\)](https://www.ceop.gov.uk): 0870 000 3344
- [ForwardUK](https://www.forwarduk.org): More information and support on FGM
- [Brook](https://www.brook.org.uk): Young people's sexual health services

ORANGE LIGHT BEHAVIOURS ARE SEXUAL BEHAVIOURS WHICH CAUSE CONCERN.

Orange light behaviours cause concern because of:

- The persistence, intensity, frequency or duration of the behaviours
- The type of activity or knowledge for the age and/or stage of development
- Inequality in age, size, power or developmental ability
- Risk to the health and safety of the child or others
- Unusual changes in a child's behaviour

Orange light behaviours signal the need to **monitor** and **provide targeted support**.

They cannot be ignored and it is important to think through the options available for the child/young person.

EXAMPLES OF ORANGE LIGHT BEHAVIOURS

Example orange light behaviours for a developmental age of 0-4 years include:

- Masturbation in preference to other activities
- Preoccupation with sexual behaviours
- Explicit sexual talk, art or play
- Persistently watching or following others into private spaces e.g. toilets, bathrooms to look at them or touch them
- Pulling other children's pants down or skirts up against their will
- Touching the genitals/private parts of other children in preference to other activities
- Attempting to touch or touching adults on the breasts, bottom, or genitals in ways that are persistent and/or invasive
- Touching the genitals/private parts of animals after redirection
- Recurrent urinary tract infections
- Communicating online with known people which may include giving out personally identifying details

WHAT CAN YOU DO?

Orange light behaviours signal the need to pay attention, monitor and gather information to consider appropriate action.

This is a good opportunity to provide sexuality and personal safety education to all of those involved. This may also be an opportunity to help support the child or young person to understand the risks to themselves or to those around them.

The child/young person may also require some form of 1:1 intervention, counselling, and/or protections from harm. It's important to talk to the child/young person about their options for support and involve parents/carers, if appropriate, or another known adult who is able to support the child.

Recognising that behaviour may be unhealthy is the first step in a process. Dealing with unhealthy sexual behaviour at an early stage can help to prevent subsequent sexually harmful behaviours from developing, which will help to keep the child/young person and those around them safe.

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

RED LIGHT BEHAVIOURS ARE SEXUAL BEHAVIOURS WHICH INDICATE OR CAUSE HARM.

Red light behaviours indicate or cause harm because they are:

- Excessive, compulsive, coercive, forceful, degrading or threatening
- Secretive, manipulative or involve bribery or trickery
- Not appropriate for the age and/or stage of development
- Between children with a significant difference in age, developmental ability or power
- Abusive or aggressive

Red light behaviours signal the need to provide **immediate protection** and **follow up support**.

EXAMPLES OF RED LIGHT BEHAVIOURS

Example red light behaviours for a developmental age of 0-4 years include:

- Compulsive masturbation which may be self-injurious, of a persistent nature or duration
- Persistent explicit sexual themes in talk, art or play
- Disclosure of sexual abuse
- Simulation of sexual touch or sexual activity
- Persistently touching the genitals/ private parts of others
- Forcing other children to engage in sexual activity
- Sexual behaviour between young children involving penetration with objects, masturbation of others, oral sex
- Indication of a sexually transmitted infection
- Communicating online with known and unknown people which may include giving out personally identifying details and / or sexual images or videos

WHAT CAN YOU DO?

Red light behaviours signal the need to provide immediate protection and follow up support, and it is important to consider actions carefully.

Following an immediate response there will also be a need to monitor, and provide sexuality and personal safety education to the child/young person and any others involved. It's important to talk to the child/young person about their options for further support, this could include some form of 1:1 intervention and/or counselling, and involve parents/carers, if appropriate, or another known adult who is able to support the child.

When determining the appropriate action, identify the behaviour, consider the context and be guided by:

- Relevant national legislation and guidance; are protections from harm and/or a legal response required?
- Organisational policies, procedures and guidance
- Human rights
- The identified risks or needs of the child/young person

- The potential or real risks to others, for example are there any other children involved?

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

Report harm or abuse. If you are aware of, or reasonably suspect, a child has been or is being sexually abused, is at risk of sexual abuse or is at risk of sexually abusing others, you should contact child protection services or the police.

AGE 5-7 YEARS

REMEMBER: IDENTIFY, UNDERSTAND, RESPOND

GREEN LIGHT BEHAVIOURS ARE SEXUAL BEHAVIOURS THAT ARE TYPICAL AND DEVELOPMENTALLY APPROPRIATE. EXPRESSING SEXUALITY THROUGH SEXUAL BEHAVIOUR IS NATURAL, HEALTHY AND A PART OF GROWING UP.

Green light behaviours are:

- Spontaneous, curious, light hearted, easily diverted, enjoyable, mutual and consensual
- Appropriate to the child's age and/or stage of development
- Activities or play among equals in terms of age, size and ability levels
- About understanding and gathering information, balanced with curiosity about other parts of life

Green light behaviours provide opportunities to **talk, explain** and **provide support**.

EXAMPLES OF GREEN LIGHT BEHAVIOURS

Example green light behaviours for a developmental age of 5-7 years include:

- Increased sense of privacy about bodies
- Body touching and holding own genitals
- Masturbation with increasing awareness of privacy
- Curiosity about other children's genitals involving looking at and/or touching the bodies of familiar children e.g. "show me yours and I'll show you mine"
- Curiosity about sexuality e.g., questions about babies, gender, relationships, sexual activity
- Telling stories or asking questions, using swear words, 'toilet' words or names for private parts
- Kissing or holding hands with known peers
- Mimicking or acting out observed behaviours such as pinching a bottom
- Supervised online communication with family or known peers

WHAT CAN YOU DO?

Green light behaviours provide an opportunity to positively reinforce appropriate behaviour, and to provide further information, explanations, and support.

All children and young people have the right to relationships and sex education which equips them with the information and skills they need to form healthy and positive relationships and to help keep them safe. We can support the child/young person's natural curiosity by talking and providing explanations about healthy sexual behaviours that are age and stage appropriate to their learning.

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

ORANGE LIGHT BEHAVIOURS ARE SEXUAL BEHAVIOURS WHICH CAUSE CONCERN.

Orange light behaviours cause concern because of:

- The persistence, intensity, frequency or duration of the behaviours
- The type of activity or knowledge for the age and/or stage of development
- Inequality in age, size, power or developmental ability
- Risk to the health and safety of the child or others
- Unusual changes in a child's behaviour

Orange light behaviours signal the need to **monitor** and **provide targeted support**.

They cannot be ignored and it is important to think through the options available for the child/young person.

Example orange light behaviours for a developmental age of 5-7 years include:

- Persistent rubbing / touching own genitals after redirection
- Masturbation in preference to other activities in public; with others and/or causing self-injury
- Explicit talk, art or play of sexual nature
- Playing / attempting to play "show me yours and I'll show you mine" games with significantly older or younger children
- Persistent attempts to touch the genitals of other children
- Persistent interest in touching or viewing other people's private body parts / private activities
- Persistent questions about sexuality despite being answered
- Persistent nudity and/or exposing private parts in public places
- Touching genitals/private parts of animals after redirection

- Recurrent urinary tract infections
- Communicating online with known people which may include giving out personally identifying details

WHAT CAN YOU DO?

Orange light behaviours signal the need to pay attention, monitor and gather information to consider appropriate action.

This is a good opportunity to provide sexuality and personal safety education to all of those involved. This may also be an opportunity to help support the child or young person to understand the risks to themselves or to those around them.

The child/young person may also require some form of 1:1 intervention, counselling, and/or protections from harm. It's important to talk to the child/young person about their options for support and involve parents/carers, if appropriate, or another known adult who is able to support the child.

Recognising that behaviour may be unhealthy is the first step in a process. Dealing with unhealthy sexual behaviour at an early stage can help to prevent subsequent sexually harmful behaviours from developing, which will help to keep the child/young person and those around them safe.

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

RED LIGHT BEHAVIOURS ARE SEXUAL BEHAVIOURS WHICH INDICATE OR CAUSE HARM.

Red light behaviours indicate or cause harm because they are:

- Excessive, compulsive, coercive, forceful, degrading or threatening
- Secretive, manipulative or involve bribery or trickery
- Not appropriate for the age and/or stage of development
- Between children with a significant difference in age, developmental ability or power
- Abusive or aggressive

Red light behaviours signal the need to provide **immediate protection** and **follow up support**.

Example red light behaviours for a developmental age of 5-7 years include:

- Rubbing / touching own genitals to the exclusion of usual activities
- Masturbation that is compulsive, self-injurious, or seeking an audience
- Rubbing own genitals on other people
- Disclosure of sexual abuse

- Simulation of sexual touch or sexual activity
- Forcing other children to play sexual games
- Sexual knowledge beyond expected for age or stage of development
- Indication of a sexually transmitted infection
- Excessive talk about sex and sexual activity
- Communicating online with known and unknown people which may include giving out personally identifying details and / or sexual images or videos

WHAT CAN YOU DO?

Red light behaviours signal the need to provide immediate protection and follow up support, and it is important to consider actions carefully.

Following an immediate response there will also be a need to monitor, and provide sexuality and personal safety education to the child/young person and any others involved. It's important to talk to the child/young person about their options for further support, this could include some form of 1:1 intervention and/or counselling, and involve parents/carers, if appropriate, or another known adult who is able to support the child.

When determining the appropriate action, identify the behaviour, consider the context and be guided by:

- Relevant national legislation and guidance; are protections from harm and/or a legal response required?
- Organisational policies, procedures and guidance
- Human rights
- The identified risks or needs of the child/young person
- The potential or real risks to others, for example are there any other children involved?

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

Report harm or abuse. If you are aware of, or reasonably suspect, a child has been or is being sexually abused, is at risk of sexual abuse or is at risk of sexually abusing others, you should contact child protection services or the police.

AGE 8-12 YEARS OLD

REMEMBER: IDENTIFY, UNDERSTAND, RESPOND

GREEN LIGHT BEHAVIOURS ARE SEXUAL BEHAVIOURS THAT ARE TYPICAL AND DEVELOPMENTALLY APPROPRIATE. EXPRESSING SEXUALITY THROUGH SEXUAL BEHAVIOUR IS NATURAL, HEALTHY AND A PART OF GROWING UP.

Green light behaviours are:

- Spontaneous, curious, light hearted, easily diverted, enjoyable, mutual and consensual
- Appropriate to the child's age and/or stage of development
- Activities or play among equals in terms of age, size and ability levels
- About understanding and gathering information, balanced with curiosity about other parts of life

Green light behaviours provide opportunities to **talk, explain** and **provide support**.

Example green light behaviours for a developmental age of 8-12 years include:

- Growing need for privacy
- Masturbation, with increasing awareness of privacy
- Curiosity about other children's genitals involving looking at and/ or touching the bodies of familiar children e.g. "show me yours and I'll show you mine" games with peers
- Showing curiosity about private parts but having a respect for the privacy of others
- Hugging, kissing, flirting, touching with known peers
- Interest and/or participation in a relationship with a peer of any gender
- Curiosity and seeking information about sexuality
- Use of sexual language
- Exhibitionism amongst same age peers within the context of play e.g. occasional flashing or mooning
- Communicating online with family and known peers

WHAT CAN YOU DO?

Green light behaviours provide an opportunity to positively reinforce appropriate behaviour, and to provide further information, explanations, and support.

All children and young people have the right to relationships and sex education which equips them with the information and skills they need to form healthy and positive relationships and to help keep them safe. We can support the child/young person's natural curiosity by talking and providing explanations about healthy sexual behaviours that are age and stage appropriate to their learning.

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

ORANGE LIGHT BEHAVIOURS ARE SEXUAL BEHAVIOURS WHICH CAUSE CONCERN.

Orange light behaviours cause concern because of:

- The persistence, intensity, frequency or duration of the behaviours

- The type of activity or knowledge for the age and/or stage of development
- Inequality in age, size, power or developmental ability
- Risk to the health and safety of the child or others
- Unusual changes in a child's behaviour

Orange light behaviours signal the need to **monitor** and **provide targeted support**.

They cannot be ignored and it is important to think through the options available for the child/young person.

Example orange light behaviours for a developmental age of 8-12 years include:

- Masturbation in preference to other activities, in public and/ or causing self-injury
- Persistent explicit talk, art or play which is sexual or sexually intimidating
- Intentional viewing of other people's private body parts / private activities
- Marked changes to behaviour e.g. mimicking older or adult flirting behaviours, seeking relationships with older children or adults in preference to peers
- Simulation of sexual activities e.g. oral sex, sexual intercourse with clothes on
- Mutual /self-masturbation with known and unknown peers
- Hugging, kissing, flirting, touching with unknown peers
- Accessing age restricted materials e.g. movies, games, internet with sexually explicit content
- Persistent expression of fear of sexually transmitted infection or pregnancy
- Recurrent urinary tract infections
- Communicating online with known people which may include giving out personally identifying details

WHAT CAN YOU DO?

Orange light behaviours signal the need to pay attention, monitor and gather information to consider appropriate action.

This is a good opportunity to provide sexuality and personal safety education to all of those involved. This may also be an opportunity to help support the child or young person to understand the risks to themselves or to those around them.

The child/young person may also require some form of 1:1 intervention, counselling, and/or protections from harm. It's important to talk to the child/young person about their options for support and involve parents/carers, if appropriate, or another known adult who is able to support the child.

Recognising that behaviour may be unhealthy is the first step in a process. Dealing with unhealthy sexual behaviour at an early stage can help to prevent subsequent sexually harmful behaviours from developing, which will help to keep the child/young person and those around them safe.

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

Red light behaviours **indicate** or **cause harm** because they are:

- Excessive, compulsive, coercive, forceful, degrading or threatening
- Secretive, manipulative or involve bribery or trickery
- Not appropriate for the age and/or stage of development
- Between children with a significant difference in age, developmental ability or power
- Abusive or aggressive

Red light behaviours signal the need to provide **immediate protection** and **follow up support**.

Example red light behaviours for a developmental age of 8-12 years include:

- Compulsive masturbation e.g. self-injurious, seeking an audience
- Persistent bullying involving sexual aggression e.g. pulling/ lifting/removing other children's clothing, sexually threatening notes, sending sexually explicit material, drawings, text messages
- Degrading or humiliating self or others using sexual themes
- Disclosure of sexual abuse
- Accessing the rooms of sleeping children to touch or engage in sexual activity
- Touching another person's genitals without permission
- Sexual activity or penetration of animals
- Sexual penetration of dolls and/or stuffed toys
- Participating in or simulating intercourse and/or oral sex with known or unknown peers with clothes off
- Sexual activity in exchange for material items or privileges
- Indication of sexually transmitted infection or pregnancy
- Communicating online with unknown people which may include giving out personally identifying details
- Communicating online with known and unknown people to send or publish sexual images, videos or audio of self or another person

WHAT CAN YOU DO?

Red light behaviours signal the need to provide immediate protection and follow up support, and it is important to consider actions carefully.

Following an immediate response there will also be a need to monitor, and provide sexuality and personal safety education to the child/young person and any others involved. It's important to talk to the child/young person about their options for further support, this could include some form of 1:1 intervention and/or counselling, and involve parents/carers, if appropriate, or another known adult who is able to support the child.

When determining the appropriate action, identify the behaviour, consider the context and be guided by:

- Relevant national legislation and guidance; are protections from harm and/or a legal response required?
- Organisational policies, procedures and guidance
- Human rights
- The identified risks or needs of the child/young person
- The potential or real risks to others, for example are there any other children involved?

If you are a professional working with young people and your organisation has internal guidance or safeguarding frameworks, please refer to these to decide on the next steps to take. Your policy or procedure should guide you towards a designated safeguarding lead who can be notified and will provide support.

Report harm or abuse. If you are aware of, or reasonably suspect, a child has been or is being sexually abused, is at risk of sexual abuse or is at risk of sexually abusing others, you should contact child protection services or the police.

Appendix 3

Support for Young People: Local and National

A dedicated NSPCC helpline 0800 136 663 went live from Thursday 1st April 2021 in response to the government announcing an immediate enquiry into allegations of sexual abuse in schools. This helpline is to support potential victims of sexual harassment and abuse. Run by the NSPCC it aims to provide advice and support to both children and adults who are victims of abuse in school. It will also include how to contact the police to report crimes. The advice line is also available to support professionals and parents.

Child and adolescent mental health services (CAMHS)

<https://camhs.mpft.nhs.uk/beeu>

Internet Watch Foundation (to potentially remove illegal images)

www.iwf.org.uk

The National Clinical Assessment and Treatment Service (NCATS)

<https://www.nspcc.org.uk/services-and-resources/childrens-services/ncats/>

Offers assessment and treatment services to children and young people with harmful sexual behaviour, and consultation and training to professionals managing complex or high-risk harmful sexual behaviour cases

The Lucy Faithful Foundation (LFF)

<https://www.stopitnow.org.uk/>

Stop It Now! UK and Ireland is a child abuse prevention campaign and helpline which is run by the LFF –supporting adults to play their part in prevention through providing sound information, educating members of the public, training those who work with children and families, and running a confidential and anonymous helpline (available for anyone with concerns about child sexual abuse)

What's the problem? A guide for parents of children and young people who have got in trouble online

<https://www.parentsprotect.co.uk/>

Parents Protect provides services to agencies working with children and their families – for those with problematic sexual behaviour on the internet and in the ‘real world’. Parents Protect is a project of the LFF, and provides an online resource for parents, and others who want to protect children from harm.

Red Balloon Learning Centres
<http://www.redballoonlearner.org/>

Red Balloon supports children who self-exclude from school and are missing education because of bullying or other trauma. It provides an academic and therapeutic programme to enable children to get back on track and reconnect with society.

Leap Confronting Conflict
<http://www.leapconfrontingconflict.org.uk/>

Leap is an award-winning national youth charity that provides inspirational conflict management programmes and support to children (and young adults) and the professionals working with them.

Barnardo's
[https://www.barnardos.org.uk/what we do/our work/sexual exploitation/cseprofessionals/cse-can-you-seeit.htm](https://www.barnardos.org.uk/what_we_do/our_work/sexual_exploitation/cseprofessionals/cse-can-you-seeit.htm)

Appendix 4

Government Guidance

HM Government, What to do if you're worried a child is being abused, advice for practitioners, March 2015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Department for Education, Preventing and Tackling Bullying: Advice for headteachers, staff and governing bodies, July 2017
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf

Department for Education, Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children 2026
[Working together to safeguard children 2026](#)

Department for Education, Keeping Children Safe in Education: Statutory guidance for schools and colleges, September 2026
[Keeping children safe in education 2026: September 2026](#)

Examples of further resources

Contextual Safeguarding Practitioners' Network
www.contextualsafeguarding.org.uk

Appendix 5 Safety Intervention Plan

AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES	ACTIONS
Details of the incident Record details of the incident from the point of view of both children	• How serious is the incident? Was it a crime? • Do we need to make arrangements to limit contact between the children involved? (If the allegation relates to rape, assault by penetration, or sexual assault, the answer is automatically yes) • How did the school find out about it? Was it reported directly or by someone else with knowledge of the incident?			Use this column to record additional information that may be relevant For example, previous, unrelated behaviour incidents	
Social risks	• Do the children share a peer group? Are people in their friend group likely to take sides? • Do they both attend your school? • Do other people know about the incident? Do those people understand: ○ Who they can talk to if they have concerns about the people involved, or about their own safety and wellbeing ○ The importance of confidentiality ○ If, and how, they may need to be involved in any further investigations • Are they likely to be the subject of gossip, bullying or further harassment? • Have there been previous incidents of sexually inappropriate behaviour within their peer group(s)? • Do they risk being alienated from their friend group(s) as a result of this incident?				
Physical risks	• Do they feel, or continue to feel, physically threatened by the other child? • Do you have reason to believe they pose a continued risk to the safety and wellbeing of the victim, or other children and staff? • Are they at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers) • Do they share classes/break times/etc.? • Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school? How can such contact be limited?				

AREA OF RISK	CONSIDERATIONS	CHILD 'A'	CHILD 'B'	NOTES	ACTIONS
Environmental risks	• Do they live in a home where violence or abuse has occurred? • Do they live in/near an area or location known to police to be high risk for sexual harassment or assault? • Are they active on social media? If so, how? Do they know how to protect themselves from online grooming? • What activities do they take part in outside of school? • Are parents clear about: ○ How the school (and partner agencies) are handling the incident ○ Confidentiality ○ The conduct expected of them while an investigation is ongoing				
DATE	UPDATES MADE	REASONS FOR UPDATES			UPDATES MADE BY
	E.g, "Updated lunchtime arrangements"	E.g, "Feedback from Child A"			

Appendix 6 Child-on-Child Abuse Risk Assessment

CHILD ON CHILD ABUSE RISK ASSESSMENT - RECORD OF SIGNIFICANT FINDINGS		
Risk Assessment for: Redhill Primary Schools and Thomas Telford Primary Free School		Assessment undertaken by: Lydia Cartwright / Claire Whiting
Address: Gatcombe Way, Priorslee, Telford George Lees Way, Priorslee, Telford		Date: September 2026 (Original Assessment July 2022, reviewed September 2023, September 2024, September 2025, May 2026)
STEP 1 - IDENTIFY HAZARDS		
Physical Abuse	Harmful Sexual Behaviour (Sexual violence and sexual harassment including AI generated sexual abuse and deepfake content)	Bullying – including cyberbullying
Racism	Hate incidents and hate crimes	Child Sexual Exploitation (see separate CSE RA for further detail)
Child Criminal Exploitation	Initiation / hazing type violence and rituals	
STEP 2 - PEOPLE AT RISK		
Children at School/Nursery, attending clubs, after school clubs, holiday clubs, off site activities.		
STEP 3 - EVALUATE, REMOVE, REDUCE AND PROTECT FROM RISK		
Adequate supervision of all children throughout the school day, inside and outside. Staff are aware of any areas deemed to be high risk but ensure regular checks of these areas are made. Safeguarding training for all staff so they can easily identify risks, signs, change in behaviour and patterns. All incidents of child-on-child are reported without delay to a DSL, responding to such concerns is in line with the school's child-on-child abuse policy. All staff know that child-on-child abuse may affect boys differently from girls (i.e. that it is more likely that girls will be victims and boys perpetrators); and that children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND; and that some children may be more likely		

to experience child-on-child abuse than others as a result of certain characteristics such as disability, sex, sexual orientation, gender reassignment, ethnicity, race or religious beliefs.

Whole school ethos and school values establish a behaviour curriculum whereby children are kind, respectful, tolerant, honest and empathetic individuals. We have an inclusive and equitable culture.

Curriculum clearly provides sufficient opportunities to raise the profile of all forms of child-on-child abuse, teaches the children what is acceptable, and what children should do if they feel that they are being abused. (See Safeguarding in the Curriculum document for further detail as to how we cover child-on-child abuse through our PSHCE, RSE, online safety, assemblies, workshops and visits.) We educate children about the nature and prevalence of child-on-child abuse, positive, responsible and safe use of social media, and the unequivocal facts about consent, via the curriculum. Children are taught to critically evaluate online content, including misinformation, disinformation and conspiracy theories, which may contribute to bullying, prejudice, hate-based incidents and radicalisation.

School systems provide children sufficient opportunity to speak out, pastoral support, worry boxes, safe surfers pupil group, playground friends, children's champions, pupil questionnaires. Systems are tested through pupil voice. Who would you talk to?

Early help on offer for all children and parents / carers who request or consent to it. (See Child Protection Policy for our offer.)

Filtering and monitoring systems in place via Fortinet and Senso, ensuring that children do not have exposure to inappropriate online content or inappropriate contact with others. (See Online Safety Risk Assessment for further details.)

As part of our commitment to our pupils, we have identified the following deputy DSL's, who are not part of our setting's senior leadership team, as staff in our setting, pupils can report child-on-child abuse to, if they choose not to report directly to a member of the senior leadership team.

Faye Bailey – Pastoral Lead

Sarah Thorpe – Nursery Manager (Redhill)

Miranda Brisco – Deputy Nursery Manager (Redhill)

Vicky Skelton – Breakfast and After School Club Manager (Redhill)

We will actively seek to raise awareness of and prevent all forms of child-on-child abuse by educating all governors, our senior leadership team, staff, students, and parents / carers about this issue. We challenge inappropriate attitudes and behaviours and will not downplay any form of harassment as banter.

Logs are kept to monitor incidents and patterns which are recorded on CPOMS, and review of systems taken where necessary by the DSL and senior leaders. Data is used to inform and update policies and procedures.

The schools' Child Protection Policy, Behaviour Policy and Child-on-child Abuse Policy are understood by all staff, identifying how this inappropriate behaviour is dealt with and the procedures to be followed if any of the signs of child-on-child abuse are discovered. All staff understand that **it does happen here** (it just may not have been reported).

All policies and procedures are aligned to KCSIE 2026 and with local safeguarding procedures in Telford and Wrekin.

Actions if Risk Occurs:

- DSL informed without delay
- All incidents recorded immediately on CPOMS safeguarding system
- Risk assessment completed for victim and alleged perpetrator
- Parents/carers informed (where appropriate)
- Consider referral to:
 - Children's Social Care
 - Early Help
 - Police (if threshold met)
- Ongoing monitoring and support put in place
- Review of this risk assessment (where necessary)

Assessment Review Date: September 2026

Completed by: Lydia Cartwright

Review outcome (where substantial changes have occurred a new record sheet should be used)