Special Partnership Trust

MANAGING ALLEGATIONS AGAINST OTHER PUPILS POLICY
(Child on Child)

Date Last Reviewed: September 2026

Review Date: September 2028

Special Partnership Trust

Child on Child abuse (Managing allegations against other pupils)
“Safeguarding is everyone’s responsibility”

1.0 Policy context:

While it is recommended that Child on Child abuse is part of the Child Protection Policy, due to the sensitive nature and specific issues involved with Child on Child abuse the Trust have completed this separate policy guidance template.

Within our Special Partnership Trust we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

All behaviour takes place on a continuum. Understanding where a child's behaviour falls on a continuum is essential to being able to respond appropriately to it. In this policy we recognise the importance of distinguishing between problematic and abusive.

Child on Child abuse can happen both inside and outside of school and online. We have a responsibility to consider Child on Child abuse in all contexts and ensure we record factual information of incidents reported to us from outside of school. This information may then be included in any referral or passing on of information to partner agencies.

The Keeping Children Safe in Education statutory guidance clearly states how schools and colleges should respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college
premises, and/or online (what to look out for and indicators of abuse are set out in Part
one of this guidance). As set out in Part one of this guidance, all staff working for the Special Partnership Trust working with children are advised to maintain an attitude of ‘it could happen here’, and this is especially important when considering child-on-child abuse.

Vulnerable groups

We recognise that all children can be at risk however we acknowledge that some groups are more vulnerable. These can include: experience of abuse within their family; living with domestic violence; young people in care; children who go missing; children with additional needs (SEN and/or disabilities); children who identify or are perceived as LGBT and/or have other protected characteristics under the Equalities

Act 2010. Whilst research tells us it is girls who are more frequently identified as being abused by their peers and girls are more likely to experience unwanted sexual harassment in schools, this is not confined to girls. Boys are less likely to report intimate relationship abuse and may display other behaviour such as antisocial behaviour. Boys report high levels of victimisation in areas where they are affected by gangs. We recognise that both boys and girls experience Child on Child abuse, but they do so in gendered ways.

2.0 Policy:

We have the following policies/protocols in place that should be read in conjunction with this policy:

Anti-Bullying Policy
Safeguarding and Child Protection Policy
Online Safety Policy
Acceptable use agreement (pupil and parent)
*Behaviour/well-being Policy
Attendance Policy
Personal devices/mobile phone policy

3.0 What is Child on Child Abuse:

Child on Child abuse occurs when a young person is exploited, bullied and /or harmed by their peers who are the same or a similar age; everyone directly involved with Child on Child abuse is under the age of 18 which defines the legal definition for a child in England.

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement. If one child causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a child's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the children concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or

- There are concerns about the intention of the alleged child. If the evidence suggests that there was an intention to cause severe harm to the victim or to exploit them, this should be regarded as abusive whether or not severe harm was actually caused.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, and school staff are supported and protected as appropriate.

All staff in our Trust should recognise that children are capable of abusing their peers and be clear about our policy and procedures with regard to Child on Child abuse outlining these procedures to minimize the risk of such abuse.

4.0 Prevention

As a Trust we will minimise the risk of allegations against other children by: -

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

- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

- Providing a developmentally appropriate PSHE and RSHE curriculum which develops/further develops children's awareness and understanding of acceptable behaviour and keeping themselves safe

- Detail within Individual Education Plans (IEPs/Intentions) bespoke targets which encourage pupils to develop / further develop the appropriate social skills in their relationships/interactions with others

- Having a robust Online safety programme (including Personal devices/Mobile phone safety) and acceptable use agreement which develops children's awareness, knowledge, understanding and skills, to ensure personal safety and self-protection when using the internet and social networking

- Having robust monitoring and filtering systems in place to ensure children are safe and act appropriately when using information technology in school ensuring effective monitoring of any incidents recorded acting upon the information obtained in a robust/effective way

- Having systems in place for any child to raise concerns with staff, knowing that they will be listened to, believed and valued

- Delivering targeted work on assertiveness and keeping safe to any child identified as being at risk

- Developing robust risk assessments including additional control measures necessary and providing targeted work for pupils identified as being a potential risk to other children (such areas may be additionally addressed via pupil well-being plans agreed/reviewed with parents/carers)

- Ensuring there are clear and consistent boundaries to what is considered to be acceptable behaviour and children will be encouraged to understand the consequences of unacceptable behaviour or language

- Effective communication with parents to ensure that parents have a clear understanding of behaviours and language that are not acceptable within school; well-being plans will be discussed/provided for children who may need additional support in developing appropriate skills/behaviours towards others

- Seeking the advice and guidance from members of multi-agency teams where appropriate – e.g. – SaLT to assist the development of pupil's effective communication skills (expressive/receptive)

Preventing abuse

Effective safeguarding practice is demonstrated when schools and colleges are clear, in advance, about what local processes are in place and what support can be accessed when sexual violence or sexual harassment has occurred. It is important to prepare for this in advance and review this information on a regular basis to ensure it is up to date. As such:

- if required, the designated safeguarding lead (or deputy) should discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the school or college's policies (especially the child protection policy) and responses, and
- the designated safeguarding lead (and their deputies) should be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required. Further information on specialist support and interventions can be found in Annex B of KCSIE 25 in the additional advice and support section under "sexual violence and sexual harassment".

5.0 Allegations against other children which are safeguarding issues.

Occasionally, allegations may be made against children by other children in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse, teenage relationship abuse and sexual exploitation, bullying, cyber bullying, the taking and sharing of nude and semi-nude images, and sexting, sexual violence or sexual harassment.

It should be considered as a safeguarding allegation against a child if some of the following features are present.

6.0 The allegation: -

- Is made against an older child and refers to their behaviour towards a younger child or a more vulnerable child
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other children in the school
- Indicates that other children may have been affected by this child
- Indicates that children outside the school may be affected by this child

7.0 Examples of safeguarding issues against a child could include:

Physical Abuse: Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be

many reasons why a child harms another and it is important to understand why a child has engaged in such behaviour, including accidentally, before considering the action or sanctions to be undertaken.

Bullying: (including cyber bulling, prejudice based and discriminatory bullying): Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both children who are bullied and who bully others may have serious, lasting problems. In order to be considered bullying, the behaviour must be aggressive and include:

- An Imbalance of Power: Children who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.

- Repetition: Bullying behaviours happen more than once or have the potential to happen more than once. Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, race, gender, sexual orientation, and excluding someone from a group on purpose.

Nude or semi-nude images: This is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, regardless of their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003. Taking and sharing nude photographs of those aged under 18 is a criminal offence. UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges.

'Upskirting': is a criminal offence – It is defined in Keeping Children Safe in Education 2025 as '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. **'Down blousing'** and **'cyber flashing'** are now criminal offences in England.

Emotional Abuse: Can include blackmail or extortion and may also include threats and intimidation. This harmful behaviour can have a significant impact on the mental health and emotional well-being of the victim and can lead to self-harm.

Sexual Abuse: Sexually harmful behaviour from children is not always contrived or with the intent to harm others. There may be many reasons why a child engages in sexually harmful behaviour and it may be just as distressing to the child who instigates it as well as the child it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse. It can also include indecent exposure, indecent touching /serious sexual assaults or forcing others to watch pornography or take part in sexting.

Teenage Relationship Abuse: Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

Sexual Exploitation: This can include encouraging other children to engage in inappropriate sexual behaviour or grooming and recruiting members of the peer group into being sexually exploited by other children or adults. It can also include photographing or videoing other children performing indecent acts.

8.0 Child sexual violence, sexual harassment and harmful sexual behaviour

Please consider in conjunction with Part 5 of KCSIE September 2025 and the Department advice: Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. We should assume it is happening in our school.

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school or college.

When we reference sexual harassment, we do so in the context of child-on-child sexual

harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them

feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised
environment

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This is likely to adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. When reports of sexual violence or sexual harassment are made, the Trust/ school will act in accordance with Part 5 of Keeping Children Safe in Education (2025). Any forms of sexual violence and harassment should not be passed off as 'banter' or 'part of growing up' or a bit of fun' and must always be taken seriously. Evidence shows that girls, children with special education needs and disabilities (SEND) and LGBT children are at greater risk.

Harmful sexual behaviour
Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected, to inappropriate, problematic, abusive and violent.
Problematic, abusive and violent sexual behaviour is developmentally inappropriate and
may cause developmental damage. A useful umbrella term is "harmful sexual behaviour"
(HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced
their own abuse and trauma. It is important that they are offered appropriate support.

All incidents of sexual harassment of a child as well as harmful sexual behaviour **must be recorded.** Ofsted/ISI would expect to see that the school are recording all incidents and analysing these carefully.

Consent
Consent is about having the freedom and capacity to choose. It is important to know that:

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

It is also important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation.

Due to their additional training, the Designated Safeguarding Lead should be involved and leading the school response. If in any doubt, they should seek expert advice.

9.0 Procedure for Dealing with Allegations of Child on Child Abuse:

When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern; if in doubt the member of staff must seek advice and guidance from the DSL/DDSL.

Responding to reports of sexual violence and sexual harassment
Part two of Section 5 in KCSIE guidance is clear that systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently
report abuse, knowing their concerns will be treated seriously. Please ensure Section 5 is referred to and followed to support all settings when dealing with a Child on Child Abuse allegation.

If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed without delay

The Designated Leads in our Trust schools are:

Curnow School – Rob Armstrong
Nancealverne School – Ruth Carpenter
Pencalenick School/ ARB – Jodie Watkins-Young
Doubletrees School – Heidi Hoskin
Orchard Manor School – Esther Craddock
Brunel School – Emily Johnston
Millwater School -Rowan Allen
Bosvena School – Josh Tyers
Castlebridge School - Bridget Williams
Lampard School – Kristel Norris

All children should feel confident to report on Child on Child abuse. Reporting systems should be made clear to children, well promoted and easily accessible. They need to feel confident that their concerns will be taken seriously.

If there is any safeguarding concern the Designated Safeguarding Lead (DSL) should always be informed.

A factual record should be made of the allegation, but **no** attempt at this stage should be made to investigate the circumstances.

The Designated Safeguarding Lead should contact the MARU / MASH to discuss the case.

The Designated Safeguarding Lead will follow through the outcomes of the discussion and make a referral where appropriate. If the allegation indicates that a potential criminal offence has taken place, the police will become involved.

Parents, of both the child/ren being complained about and the alleged victim/s, should be informed and kept updated on the progress of the referral.

The Designated Safeguarding Lead will make a record of the concern, the discussion and any outcome and keep a copy in CPoms.

If the allegation highlights a potential risk to the school and the child, the school will follow the school's behaviour policy and procedures and take appropriate action.

In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

Best practice in relation to record keeping and confidentiality should be adhered to at all times.

If the child has disclosed any potential harm staff need to ensure the principles and best practice of dealing with a disclosure of abuse are followed

10.0 Risk Assessment

In situations where any school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

Where there has been a report of physical or sexual violence the Designated Safeguarding Lead should make an immediate risk and needs assessment, updating all risk assessment documentation accordingly.

If the allegation is of a verbal nature, then the need for a risk assessment should be decided on a case by case basis.

All decisions need to be carefully documented and these records kept securely by the Designated Safeguarding Lead.

It is important to consider the wishes and feelings of the alleged victim, but these should not override any actions in relation to potential safeguarding risks to other children. The potential for ongoing risk of harm towards children and staff should be considered. Sensitivity however is key.

Other related issues and the wider context should be considered as part of the risk assessment

Consideration about how best to support and protect the alleged perpetrator will also be considered. Referrals where appropriate will be made to Early Help or Children's Social Care through the Designated Safeguarding Lead.

If it is considered necessary to involve the police, this will be done in parallel with a referral to children's social care.

Follow up Actions - children sharing a classroom:

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

- We will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises and on transport to and from the school. This is likely to include removing the alleged perpetrator from any classes they share with the victim.

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.

11.0 Manage Internally

In some cases, the Designated Safeguarding Lead may make the decision that this is a one-off incident with no significant harm to the child and deal with it internally. The behaviour and bullying policy may be referred to in these incidents.

12.0 Support for Children

The age and developmental stage of the alleged victim/perpetrator needs to be considered within any one of our Trust schools and the risk of any further harm. It needs to be considered that a power imbalance may have been created between the victim and the alleged perpetrator and as such will need an informed response.

The child's wishes:

Keeping Children Safe in Education additionally specifies:

'Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at their heart'.

The schools within our Trust will use whatever means to address any difficulties our pupils experience due to the very nature of their special educational need – e.g. – communication difficulties, behavioural difficulties looking towards an array of resources to inform their work – e.g. - effective forms of communication which provide meaning for the pupil – signing, PECs, bespoke well-being (behaviour plans) to try to secure a greater understanding of types of behaviour which are/are not acceptable.

13.0 Role of the Local Governing Body:

Keeping Children Safe in Education specifies Governing bodies and proprietors should ensure their child protection policy includes procedures to minimise the risk of Child on Child abuse and sets out how allegations of Child on Child abuse will be investigated and dealt with. The document also states it is most important to ensure opportunities of seeking the voice of the child are heard:

'Governing bodies, and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, any system and processes should operate with the best interests of the child at their heart.'

While it is recommended that Child on Child abuse is part of the Child Protection Policy, due to the sensitive nature and specific issues involved with Child on Child abuse Trustees have completed this separate policy guidance template.

If the allegation highlights a potential risk to the school and the pupil, the school will follow the Trusts behaviour policy and procedures and take appropriate action.

Recommended Resources

This advice should not be read in isolation. It is important for schools in the Trust to consider other relevant advice and guidance, including the following (which is not intended to be an exhaustive list), as part of their approach to protecting children from bullying and sexual harassment and sexual abuse. The most up to date resource list can be found in KCSIE part 5.

Useful guidance/advice includes:

- Keeping children safe in education 2025 (statutory guidance for schools and colleges)
- Teaching about relationships sex and health (guidance for schools) Last updated March 2021
- Relationship Education, Relationships and Sex Education and Health Education (statutory guidance for schools) Currently being updated following a national consu8ltation which closed July 2024
- Working Together to Safeguard Children (statutory guidance for schools and colleges) Last updated February 2024
- Exclusions from maintained schools, academies and PRUs (statutory guidance for schools) Last updated August 2024
- Behaviour in Schools (advice for schools) Last updated February 2024
- Children Missing Education (advice for schools) Last updated August 2024
- Preventing and Tackling Bullying (advice for schools), Last updated July 2017
- Cyberbullying (advice for schools) Last updated November 2014
- The Equality and Human Rights Commission (provides advice on avoiding discrimination in a variety of educational contexts)
- Promoting children and young people's emotional health and wellbeing (advice for schools) Published May 2024

- UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people Last updated February 2024

- PACE Code C 2023 PACE Code C 2023 - GOV.UK (www.gov.uk)