

Widford Lodge  
PREPARATORY SCHOOL



**7a**

**Child-on-Child Harmful Sexual Behaviour/Sexual  
Violence/Sexual Harassment Policy**

**This policy applies to all pupils in the school including those in the EYFS and has full regard to the Department for Education documents 'Keeping Children Safe in Education' (2025) and 'Working Together to Safeguard Children' (2023)**

Reviewed and approved by Proprietor: February 2026

Review Date: September 2026

## **Introduction and definition**

It is normal for some children and young people to display sexualised behaviour towards their peers as they develop. However, sexualised behaviour between peers that has become harmful or abusive is unacceptable and must be addressed.

We understand that children's sexual behaviours exist on a continuum, ranging from age-appropriate / developmental to inappropriate / problematic / abusive. We also understand that harmful sexual behaviour and child-on-child abuse can occur between children of any age and gender, either in person or online. We recognise that children who display harmful sexual behaviour may have experienced their own abuse and trauma, and we will support them accordingly.

Our school recognises that children and young people are vulnerable to and capable of abusing their peers sexually regardless of age and sex and within intimate personal relationships between peers. We consider any allegation of child-on-child sexual abuse seriously and do not tolerate or pass off harmful sexual behaviour as banter, just having a laugh, part of growing up or boys being boys: we have a zero-tolerance approach to abuse and recognise the implications for a culture of unacceptable behaviours and unsafe environments for children. These allegations are managed in the same way as any other child protection concern and follow the same procedures, including seeking advice and support from other agencies as appropriate. We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported, and staff are advised to maintain an attitude of "it could happen here". We are aware of the importance of challenging physical behaviour such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

This policy is in line with the safeguarding requirements in Keeping Children Safe in Education (Department for Education, 2025) which we must work to and also links to the guidance issued by the Department for Education in 2021, Sexual violence and sexual harassment between children in schools and colleges. This latter guidance will be followed with regard to definitions, context, legal responsibilities and responding to reports.

We also make use of nationally recognised resources, including the Lucy Faithfull Foundation's confidential helpline or online chat, which provides support for those worried about child sexual abuse and behaviour.

Sexual abuse is defined (Keeping Children Safe in Education 2025) as forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. We are aware of the definitions of sexual violence in the Sexual Offences Act 2003 and that our pupils, being under the age of 13, can never consent to any sexual activity. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. The sexual abuse of children by other children is a specific safeguarding issue in education.

We recognise that it is more likely that girls will be victims and boys perpetrators but all child on child abuse is unacceptable and will be taken seriously. We understand that a group of children may sexually assault or sexually harass a single child or group of children and that sexual violence and sexual harassment exist on a continuum and may overlap.

## **Harmful Sexual Behaviour**

Harmful sexual behaviour can manifest itself in many ways. This may include:

- Inappropriate or unwanted sexualised touching
- Causing someone to engage in sexual activity without consent
- Sexual violence and sexual harassment (to be responded to in accordance with the detailed guidance in Part 5 of KCSIE)
- Sexual comments (telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names)
- Physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes
- Sexual 'jokes' or taunting
- Displaying pictures, photos, or drawings of a sexual nature
- 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/or videos (also known as sexting or youth produced sexual imagery)
- Sharing of unwanted explicit content
- Bullying of a sexual nature online or offline, for example sexual or sexist name calling
- Unwanted sexual comments and messages, including on social media
- Sexual exploitation, coercion, and threats
- Abuse in intimate personal relationships between peers
- Coercing others into sharing images of themselves or performing acts they are not comfortable with online.

Our school also understands the different gender issues that can be prevalent when dealing with harmful sexual behaviour. Children and young people can experience harmful sexual behaviour in various settings, including at school, home, another home, in public places and online. At school, issues can occur in places which are supervised and unsupervised, such as toilets, corridors, changing areas and outside spaces or when travelling home. We understand that children with SEND are three times more likely to be abused than their peers.

This policy applies to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside school and online; we recognise that safeguarding incidents and/or behaviours can be associated with factors outside school, including intimate personal relationships.

### **Other Forms of Child-on-Child Abuse**

This may include:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Initiation/hazing type violence and rituals.

### **How we seek to minimise the risk of harmful sexual behaviour**

The principle aim of our approach is to foster the conditions in which our pupils can aspire to and realise safe and healthy relationships, at school and as they continue in life. We work to a culture in which the voice of the children and young people is central, where pupils feel able to share their concerns openly, knowing that they will be listened to and that they will not be judged. We aim to create a culture where sexual harassment and online sexual abuse are not tolerated and where we identify issues and intervene early to better protect young people. We understand that early intervention can help prevent problematic, abusive and/or violent behaviour in the future.

We use risk assessments to inform our practice on harmful sexual behaviour and individual cases and involve other partners as appropriate.

### **Children and young people**

We use relationships, sex and health education to help our pupils understand, in an age-appropriate way, what harmful sexual behaviour is, including by peers. We teach them the knowledge they need to recognise and report abuse, including emotional, physical and sexual abuse. We also teach them about the importance of making sensible decisions to stay safe, including online, whilst being clear that if a child or young person is abused, it is never their fault. We help our pupils to develop the skills to understand:

- what constitutes harmful sexual behaviour
- that such behaviour is not acceptable
- the possible reasons for such behaviour, and vulnerability of perpetrators
- that they must tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable, or if they witness such behaviour towards others.

We understand our pupils may not always feel able to talk to adults about child-on-child sexual abuse. To help them, we will encourage them to share their thoughts and opinions, respond to their concerns and respect and listen to them. We want our pupils to feel confident that any concerns they raise will be responded to appropriately.

### **Parents and carers**

It is important that parents and carers understand what is meant by harmful sexual behaviour and reinforce key messages from school at home. We work in partnership with parents to support our pupils and want to help them keep their children safe. Parents and carers should understand:

- the nature of harmful sexual behaviour
- the effects of harmful sexual behaviour on children and young people
- the likely indicators that such behaviour may be taking place
- what to do if it is suspected that child-on-child sexual abuse has occurred.

Further information to support parents and carers in relation to harmful sexual behaviour is available online, including on the NSPCC and Lucy Faithfull Foundation websites. We will work with the parents of the victim and alleged perpetrator as appropriate and where this is not considered to put a child at additional risk; we will seek advice from the relevant agencies regarding parental involvement.

### **Staff**

Our staff undertake annual safeguarding training where the different types of abuse and neglect are discussed; this includes information about harmful sexual behaviour and our expectations for staff vigilance about this and other potential types of abuse. Staff also receive updates on safeguarding issues throughout the school year, including about the nature and prevalence of harmful sexual behaviour, where appropriate. Importantly, the training also ensures that our staff know what to do if they receive a report that harmful sexual behaviour may have occurred, including how to support the children.

### **Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. We have systems in school to filter information and block internet access to harmful sites and inappropriate content. These systems are monitored and regularly reviewed to ensure they are effective, and all staff are trained in online safety and how to report concerns.

We also recognise the risks posed by misinformation, disinformation, conspiracy theories and harmful use of generative AI tools. Pupils will be educated about these issues, and the school will use the Department for Education's Plan Technology for your School tool to review filtering, monitoring and cyber security arrangements.

Our Designated Safeguarding Lead has been trained to ensure a good understanding of harmful sexual behaviour. We are clear about the local processes in place and the support that can be accessed when sexual violence or harassment have occurred.

### **Our response to an incident/allegation**

The wellbeing of our pupils is always central to our response to an allegation or incident of harmful sexual behaviour. Any child or young person reporting a concern will be treated respectfully. We will reassure them that they are being taken seriously and that they will be supported and kept safe: no one will be given the impression that they are creating a problem by reporting abuse or made to feel ashamed. It will be explained that the law is in place to protect rather than criminalise them.

Our staff will never promise confidentiality as the concern will need to be shared further. The Designated Safeguarding Lead will need to be informed as soon as possible of any incident and the details may also need to be shared with Children's Social Care/the police and other specialist agencies. We have in place effective working relationships with our safeguarding partners, which are essential to ensuring that concerns are appropriately managed. The threshold for dealing with an issue of pupils' behaviour or bullying under the safeguarding policy is where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

In some cases, where we may need to involve another agency, this may be against the wishes of a child and /or their parent be challenged and addressed. In such cases, we will explain our reasons for doing so and support them accordingly.

We will explain next steps so that the child understands what will happen, including who will be informed. Where the child already has social care involvement, such as a looked after child, a child in need or a child with a child protection plan, we will inform the child's social worker and work in partnership with them as appropriate.

Whilst we establish the facts of the case and start the process of liaising with other agencies as appropriate, we will consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school premises. We understand the distress experienced by children who are victims can be exacerbated if the alleged perpetrator is at the same school.

We will do all we reasonably can to protect the anonymity of any children involved in any report of harmful sexual behaviour. This means we will consider carefully, based on the nature of the report, which staff should know about it, and which staff should know about any support that will be put in place for the children involved. We will, where possible, manage reports with two members of staff present, one of whom is the Designated Safeguarding Lead or deputy.

Where an incident includes an online element, we will always work in accordance with appropriate guidance, taking advice from other partners as necessary. Our staff will not view an indecent image of a child or young person unless absolutely necessary, nor forward it for any reason. If advised of an incident relating to nudes and semi-nudes being shared we will follow the government advice in [Searching screening and confiscation](#) and the full 2024 guidance from the UK Council for Internet Safety (UKCIS), [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). See appendix 1.

We understand the need to follow the DfE's guidance with regard to the immediate response to a report and the ongoing response. We also understand how important it is for us to respond appropriately to a report because of the impact it will have on the confidence of future victims to come forward.

### **Records and investigation**

It is essential that information relating to allegations about harmful sexual behaviour is recorded in writing within our school, as with any other child protection concern and in line with our child protection policy. The record may form part of a statutory assessment by Children's Social Care or by another agency.

Any member of staff receiving a disclosure of harmful sexual behaviour or noticing signs or indicators of this will record it as soon as possible, noting what was said or seen (using a body map if appropriate), giving the date, time and location and recording the facts as presented by the child or young person. Leading questions should be avoided, but staff can ask children if they have been harmed and what the nature of that harm was.

The record will be passed immediately to the Designated Safeguarding Lead or Deputy, who will decide on appropriate action and record this. Where there is an immediate risk of harm, staff will speak to the Designated Safeguarding Lead or Deputy first and record as soon as possible afterwards.

All related concerns, discussions, decisions and reasons for decisions will be dated and signed and will include the action taken.

The Designated Safeguarding Lead or Deputy will be responsible for leading investigations and for liaising with other agencies as appropriate, such as Children's Social Care and the police. They will also be the main point of contact for parents and carers. They will ensure there are accurate records at each stage of the investigation and that any supporting information is included in the child protection files.

### **Brook Traffic Light Tool**

At Widford Lodge, we have undertaken training and hold a license for Brook's nationally recognised Sexual Behaviours Traffic Light Tool. This tool helps professionals to identify, understand and respond appropriately to sexual behaviours in children and young people. It helps us make consistent and informed decisions about our response to sexual behaviours and it supports our existing safeguarding arrangements.

### **Risk Assessment**

We will complete a risk assessment following a report of harmful sexual behaviour, considering all the children and young people involved in an incident. This would include the following considerations: the victim, and any actions that may be appropriate to protect them; whether there may have been other victims; the alleged perpetrator(s); the time and location of the incident(s), and any action required to make the location(s) safer. We will also consider all other pupils at our school and any actions that may be appropriate to protect them. Risk assessments will be regularly reviewed to ensure they remain relevant and fit for purpose. Where appropriate, the affected child/young person and their parents/carers will be invited to contribute to the completion and review of the risk assessment.

### **Guiding Principles**

The safety of our pupils is paramount. We will use a proportionate approach, basing our actions on the principle that harmful sexual behaviour is not acceptable and will not be tolerated. All concerns will be considered carefully and on a case by case basis, underpinned by robust risk assessments. Our actions will

not be judgemental about the guilt of the alleged perpetrator and will always be taken in the interests of all children and young people concerned.

Whilst inappropriate behaviours will be challenged and addressed, it is in the context of providing appropriate support to all children in our school where harmful sexual behaviour has occurred. We understand there are many factors which may lead a child to display abusive behaviours towards other children, and that these matters are sensitive and often complex. We recognise our school may be the only stable, secure, and safe element in the lives of some children, particularly those who have experienced harm and trauma.

Our approach will help us to ensure that all pupils are protected and supported appropriately. The following principles will guide us:

- the wishes of the child/young person in terms of how they want to proceed – the victim will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- the nature of the alleged incident, including whether a crime may have been committed
- the ages and developmental stages of all children and young people involved
- consideration of any power imbalance between the children and young people – for example is the alleged perpetrator significantly older, more mature, more confident/does the victim have a disability or learning difficulty
- consideration of whether the alleged incident is one off or a sustained pattern of abuse
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- the importance of understanding intra-familial harms and any necessary support for siblings following incidents
- consideration of any ongoing risks to the victim, other children/young people or staff
- consideration of any other related issues and wider context.

We will be mindful of the need to look out for potential patterns of concerning, problematic or inappropriate behaviour.

### **Supporting the child/young person who has allegedly experienced harmful sexual behaviour**

We will assess what short and long term support may be needed to help the child manage the immediate aftermath of an incident and to recover from what they have experienced. The child's existing support network will be central to this and we will work with other partners as appropriate and in accordance with the child's wishes, and wherever appropriate, in discussion with parents/carers. All victims will be reassured that they are being taken seriously, not made to feel ashamed and that they will be supported and kept safe.

We will consider what is necessary to support the child straight away, for example by making adaptations to their timetable and in-school support and taking steps to protect them from attention or peer pressure they may experience due to making a report. This work will be guided by a robust risk assessment process and will ensure that the child and their parents/carers have an opportunity to contribute. We will also consider intra-familial harms, and any necessary support for siblings following an incident. We will also ensure there is regular review of arrangements to be confident they meet the needs of all involved.

It may be necessary to make requests for support to mental health and wellbeing services or for therapeutic intervention. We may also need to link with other agencies to remove inappropriate material from the internet, such as the Internet Watch Foundation.

### **Supporting the child/young person who has allegedly displayed harmful sexual behaviour**

We have a duty of care to all pupils and we will protect and support children and young people who have displayed abusive or harmful sexual behaviour. We will do this through considering the needs of the child, any risks to their safety and what multi-agency responses are needed to support them and their family. This work will be guided by a robust risk assessment process and we will ensure that the child and their parents/carers have an opportunity to contribute. We will also ensure there is regular review of arrangements to be confident they meet the needs of all involved.

Some children/young people may not realise they have behaved abusively. We will avoid using language that may make them feel judged or criminalised and ensure that any intervention will be at the least intrusive level required to effectively address the behaviour. Where appropriate, pupils and families will be signposted to confidential support services such as the Lucy Faithfull Foundation's confidential helpline or online chat, which provides support for those worried about child sexual abuse and behaviour.

We will consider appropriate sanctions using our behaviour policy and work with the child/young person and their support network to consider measures that may help to address their behaviour. Where a request for support is going to be made to children's Social Care or the police, then, as a general principle, our DSL will speak to those agencies to discuss next steps, including how the alleged perpetrator(s) will be informed of the allegations. This will not prevent the school from taking immediate action to safeguard children, where required.

### **Ongoing support for our children**

Children who have experienced harmful sexual behaviour display a wide range of responses. Children may show clear signs of trauma, physical and emotional responses, or no overt signs at all. Children who display harmful sexual behaviour may also respond in these or in other ways. We will remain vigilant and show sensitivity to the needs of all our children, for example, about attendance in lessons.

We will consider what ongoing support our children may need, and tailor this on a case-by-case basis. For example, the support provided for children following a single incident of a lewd remark may be different from that following a report of sexual assault. Examples are pastoral support, counselling services, and ensuring that there is a trusted adult for the children involved to speak with if they wish to. It may be necessary for us to maintain arrangements to protect and support victims for some time, working with Children's Social Care and other agencies as required.

We may also need to provide support to children who have witnessed harmful sexual behaviour, or otherwise been affected. This will be informed by our risk assessment and our ongoing work.

We will also consider whether any intervention or support is required as part of a whole-school approach for our children, or with the wider school community.

### **Investigation outcomes**

Our investigation of an allegation or incident will enable us to determine the outcome, working with our safeguarding partners as appropriate. We will always seek to ensure that the outcome of an investigation is appropriate and proportionate to the circumstances in relation to the report but in line with our zero tolerance stance. Various options are open to us:

- **Manage internally** – in some cases, for example one off incidents, we may take the view that the children/young people concerned are not in need of early help or statutory intervention. In these cases we will follow our other school policies in addressing matters, for example our behaviour and anti bullying policies.

- We will also consider what support is needed going forward, for example pastoral support, counselling services, and ensuring there is a trusted adult for those affected to speak with if they wish to.
- We will also consider whether any intervention or support is required as part of a whole setting approach or with the wider school community.
- **Early help** – where statutory intervention is not required or agreed, we may use early help instead. This means providing support as soon as a problem emerges at any point in a child or young person’s life. We will work with parents and carers and other relevant partners when following this approach, which can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation.
- **Requests for support to Children’s Social Care** – where a child or young person has been harmed, is at risk of harm, or is in immediate danger, we will make a request for support from Children’s Social Care.
  - We will generally inform parents/carers of this unless to do so may put the child/young person at additional risk.
  - We will seek advice from other partners on such matters. If we make a request for support, Children’s Social Care will consider whether the child/young person involved is in need of protection or other services. Where statutory assessments are appropriate, the school will work with Children’s Social Care and other agencies as appropriate. Partnership working helps to ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator and any other child/young person requiring support.
  - In some cases, Children’s Social Care will review the evidence and decide a statutory intervention is not appropriate. If so, we will consider what other support may be required and we will make further requests for support to Children’s Social Care if we consider that a child or young person remains in immediate danger or at risk of harm.
- **Reporting to the police** – where a report of rape, assault by penetration or sexual assault is made, we will report it to the police.
  - We will generally inform parents or carers about reports of sexual abuse, unless to do so may put a child or young person at additional risk.
  - We will seek advice from other partners in individual cases.
  - Where parents or carers have not been informed we will ensure we support the child/young person in any decision we take, which is likely to be with the support of Children’s Social Care and any appropriate specialist agencies.
  - Where we have made a report to the police, we will consult with them and agree what information can be disclosed to staff and others, in particular the alleged perpetrator and their parents/carers. We 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 police and other agencies as appropriate to support all children and young people involved, including potential witnesses. This will help to ensure that any actions we take do not jeopardise a police investigation.
  - Sometimes the police will decide that further action is not required, in which case we will continue to engage with other agencies to support the children/young people involved.
- If a report is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead will consider whether the person making the allegation may be in need of help or whether any disciplinary action is appropriate.

## Review

All child protection concerns are reviewed regularly, to ensure that everything has been fully addressed, actions completed and to consider whether the children/young people involved need any further support.

We will continue to work with parents/carers and other agencies as appropriate and risk assessments will be reviewed and updated as required.

We will review decisions and actions and will update policies to reflect lessons learned, in particular addressing any patterns of concerning, problematic or inappropriate behaviour.

Reviews will also ensure that our policy and practice remain consistent with current safeguarding guidance, including expectations around digital safety, inclusive terminology and the use of national support services.

# Appendix 1

## Sharing nudes and semi-nudes: how to respond to an incident

An overview for all staff working in education settings in England

UK Council for  
Internet Safety

This document provides a brief overview for frontline staff of how to respond to incidents where nudes and semi-nudes have been shared.

**All** such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies.

The DSL or equivalent should refer to the full 2024 guidance from the UK Council for Internet Safety (UKCIS), [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#), for managing incidents.

### What do we mean by sharing nudes and semi-nudes?

In the latest advice for education settings (UKCIS, 2024), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. Nudes and semi-nudes can be shared online via social media, gaming platforms, chat apps, forums, or involve sharing between devices using offline services. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nudes are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

### What to do if an incident comes to your attention

**Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.**

- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal.**<sup>1</sup>
- If you have already viewed the imagery by accident (e.g. if someone has shown it to you before you could stop them), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

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<sup>1</sup> In exceptional circumstances, it may be necessary for the DSL (or equivalent) only to view the image to safeguard the child or young person. That decision should be based on the professional judgement of the DSL (or equivalent).