

Widford Lodge PREPARATORY SCHOOL



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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' (2026) and 'Working Together to Safeguard Children ' (2026)

Reviewed and approved by Proprietor: September 2026

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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 and developmental to inappropriate and problematic. This can escalate to sexual harassment or sexual violence. Early identification and intervention are therefore essential to prevent inappropriate or problematic behaviour developing into more serious abuse.

We also understand that harmful sexual behaviour and child-on-child abuse can occur between children of any age and sex, 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, including within intimate personal relationships between children. We consider any allegation of child-on-child sexual abuse seriously. We do not tolerate or pass off sexual harassment or sexual violence as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. We have a zero-tolerance approach to sexual harassment and sexual violence and recognise the implications of a culture of unacceptable behaviour and unsafe environments for children. Concerns are managed as safeguarding matters, including seeking advice and support from other agencies as appropriate. Even if there are no reported cases, abuse may still be taking place and simply not being reported; staff must maintain an attitude of 'it could happen here'. Staff must challenge physical behaviour such as grabbing bottoms, breasts or genitalia, pulling down trousers, flicking bras and lifting skirts.

This policy reflects Part Five of Keeping Children Safe in Education 2026, which sets out how schools should understand and respond to harmful sexual behaviour, child-on-child sexual harassment and sexual violence.

This policy should be read alongside the Arrangements for Safeguarding and Child Protection Policy, Promotion of Good Behaviour Policy, Anti-Bullying Policy and E-safety Policy, and the Relationships, Sex and Health Education Policy.

This policy uses the terms 'victim' and 'alleged perpetrator' because they are widely understood. However, a child may not consider themselves to be a victim or may not wish to be described in this way. A child reported to have displayed harmful or abusive behaviour may not recognise their behaviour as abusive and will also require a safeguarding response. Staff will use language appropriate to each child and their circumstances.

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

Sexual abuse and sexual violence

Sexual abuse is defined in Keeping Children Safe in Education 2026 as forcing or enticing a child or young person to take part in sexual activities, which may not involve violence and whether or not the child is aware of what is happening. Activities may involve physical contact, including assault by penetration, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside

clothing. They may also include non-contact activities, such as involving children in looking at or producing 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 facilitate offline abuse. Sexual abuse of children by other children is a specific safeguarding issue in education.

For the purposes of this policy, sexual violence refers to the sexual offences described in the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and causing someone to engage in sexual activity without consent.

Consent means having the freedom and capacity to choose. Consent can be given for one activity but not another and can be withdrawn at any time. A child under the age of 13 can never consent to any sexual activity; the age of consent is 16, and sexual intercourse without consent is rape.

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

Harmful sexual behaviour

Harmful sexual behaviour (HSB) is an umbrella term used in child protection for behaviour occurring online, face-to-face or both. HSB must always be considered within a child protection context. When assessing behaviour, the ages and developmental stages of the children and any difference in age, development, power, disability, physical size or social status are critical.

Harmful sexual behaviour can manifest in many ways, including:

- inappropriate or unwanted sexualised touching
- causing someone to engage in sexual activity without consent
- sexual violence and sexual harassment
- sexual comments, stories, remarks about clothing or appearance, or sexualised names
- physical behaviour such as deliberately brushing against someone or interfering with clothing
- sexual jokes or taunting
- displaying pictures, photographs or drawings of a sexual nature
- upskirting, which is a criminal offence
- making or sharing nude or semi-nude images or videos, whether consensual or non-consensual
- sharing unwanted explicit content
- sexualised or sexist bullying online or offline
- unwanted sexual comments and messages, including on social media
- sexual exploitation, coercion or threats
- abuse within intimate personal relationships between children
- coercing others into sharing images or performing acts online with which they are uncomfortable

Our school recognises that misogynistic attitudes, language and behaviour can contribute to a culture in which sexual harassment and sexual violence are normalised. Misogyny, misandry and other gender-based or derogatory behaviour will be identified, challenged and addressed at an early stage.

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.

Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature occurring online or offline and inside or outside school. It may violate a child's dignity, make them feel intimidated, degraded or humiliated, or create a hostile, offensive or sexualised environment. If left unchallenged, it can normalise inappropriate behaviour and increase the risk of sexual violence.

Other forms of child-on-child abuse

Other forms may include:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- physical abuse, including hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- serious physical harm or threats involving weapons
- initiation or hazing-type violence and rituals

How we seek to minimise the risk of harmful sexual behaviour

The principal aim of our approach is to foster conditions in which pupils can develop safe and healthy relationships. We work to a culture in which children's voices are central and pupils can share concerns openly, knowing they will be listened to and not judged. Sexual harassment and online sexual abuse are not tolerated. We identify issues and intervene early because early intervention can prevent problematic, abusive or violent behaviour in the future.

We use risk and needs assessments to inform our practice on harmful sexual behaviour and individual case management, 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 emotional, physical and sexual abuse and to make sensible decisions to stay safe, including online, while understanding that abuse is never the victim's fault.

We help our pupils to understand:

- what constitutes harmful sexual behaviour, sexual harassment and sexual violence
- that such behaviour is unacceptable
- the possible reasons for such behaviour and the vulnerability of children who display it
- that they must tell a trusted adult if someone makes them uncomfortable or if they witness concerning behaviour

We will maintain clear, well-promoted and accessible reporting routes so that children can confidently report abuse and know that their concerns will be taken seriously.

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, without judgement.

Parents and carers

Parents and carers should understand the nature and effects of HSB, likely indicators and what to do if abuse is suspected. We work in partnership with parents to reinforce key messages and keep 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.

Information is available from organisations including the NSPCC and Lucy Faithfull Foundation. We will work with parents of the victim and alleged perpetrator where appropriate, and where doing so would not place a child at additional risk, taking advice from relevant agencies when necessary.

Staff

Our staff undertake annual safeguarding training covering types of abuse and neglect, HSB, sexual harassment and sexual violence, expectations of vigilance. 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.

The DSL and deputy have a good understanding of HSB, local referral arrangements and specialist support services.

Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our school uses filtering and monitoring systems to block harmful sites and inappropriate content. Their effectiveness is reviewed monthly and an audit carried out at least once each academic year by the senior leader responsible for filtering and monitoring, the DSL, Headteacher and our IT support. Checks cover all internet-connected devices in relevant locations and are recorded.

We recognise risks from misinformation, disinformation, conspiracy theories and harmful uses of generative AI. Pupils are educated about these issues, and the school uses relevant Department for Education resources to review filtering, monitoring and cybersecurity arrangements.

Our DSL 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.

Nude and semi-nude images

All incidents involving the making or sharing of nude or semi-nude images require a safeguarding response, whether sharing was consensual or non-consensual. The response will be proportionate and consider the children's ages, development and circumstances and any coercion, exploitation or vulnerability. This includes real, altered or AI-generated nude or semi-nude images of a child.

Widford Lodge School will follow the current UK Council for Internet Safety guidance, Sharing nudes and semi-nudes: advice for education settings working with children and young people, and relevant searching, screening and confiscation guidance. Staff will not view or forward illegal images. Where viewing is unavoidable, only the DSL or deputy will make that decision in accordance with the guidance. In some cases, it may be appropriate to confiscate a device to preserve evidence and hand it to the police.

Our response to an incident or allegation

The wellbeing of pupils is central to the response. A child reporting a concern will be treated respectfully, reassured that they are being taken seriously regardless of how long it took them to come forward, supported and kept safe. No child will be made to feel that they are creating a problem or made to feel ashamed. Staff will explain that the law protects rather than criminalises children.

Our staff will not wait for a child to make a direct verbal disclosure. Concerns may arise through a friend, an overheard conversation, changes in behaviour or attendance, distress or other signs that something may be wrong. Staff will act immediately on any concern about a child's welfare.

Where possible, reports will be managed with two members of staff present, preferably including the DSL or deputy. Staff will listen carefully, use the child's language, avoid judgement and ask only open-ended questions. An initial disclosure may not show the full extent of abuse, and trauma can affect memory. Staff will recognise additional barriers to disclosure relating to disability, sex, ethnicity or sexual orientation.

Our staff will never promise confidentiality. Information will be shared only with those necessary to progress the concern. The DSL or deputy must be informed as soon as practicably possible and the child will be told what will happen next and who will be informed. If the child already has social care involvement, the child's social worker will be informed as appropriate.

All concerns involving HSB, sexual harassment or sexual violence will be considered within a safeguarding context. Where a child has been harmed, is at risk of harm or is in immediate danger, a referral will be made to Essex Children's Social Care through the Children and Families Hub in accordance with current SET Procedures. Parental consent is not required where a statutory referral is necessary. Lower-level concerns may still require internal safeguarding action, universal or community-based early help, or targeted Family Help.

If information must be shared or another agency involved against a child's or parent's wishes, the reasons will be explained sensitively and appropriate support offered. The victim's wishes will be balanced against the duty to protect them and other children.

Immediate separation and safety arrangements

Where a report concerns rape or assault by penetration, the alleged perpetrator will be removed from any classes shared with the victim while the school establishes the facts and liaises with local

authority children's social care and the police. Reasonable physical separation will also be considered across the premises, before and after school activities and on school transport. These are safeguarding measures and are not a judgement of guilt.

For other reports of sexual harassment or sexual violence, arrangements concerning shared classes, proximity on site, activities and transport will be considered immediately on a case-by-case basis, taking account of the victim's wishes and the need to protect all children involved.

Our school will take reasonable steps to protect the anonymity of all children involved, including careful decisions about which staff need to know and what support arrangements should be shared. The potential impact of social media, rumours and peer pressure will be considered.

Records and agency investigation

Information relating to allegations will be recorded in writing in line with the child protection policy. Any member of staff receiving a disclosure or noticing signs will make a record as soon as possible, including the child's words, date, time and location, without interpretation or personal opinion. A body map may be used where appropriate. Leading questions must be avoided, although staff may ask whether a child has been harmed and the nature of the harm.

The record will be passed immediately to the DSL or deputy. Where there is immediate risk, staff will speak to them first and record the concern as soon as possible afterwards. All concerns, discussions, decisions, action and the rationale for decisions will be recorded. Records must be signed, timed and dated.

Relevant information will be included in the individual child protection file of every child involved.

The DSL or deputy will lead and coordinate the school's safeguarding response and liaise with local authority children's social care, the police and other agencies as appropriate. Our school will not undertake an investigation that could prejudice a statutory or criminal investigation.

Brook Traffic Light Tool

The DSL has undertaken training and holds a license for Brook's Sexual Behaviours Traffic Light Tool. It supports professionals to identify, understand and respond consistently to sexual behaviours. It informs professional judgement but does not replace safeguarding procedures, statutory referrals or specialist assessment.

Risk and needs assessment

Following a report of sexual violence, the DSL or deputy will complete an immediate, recorded risk and needs assessment. For sexual harassment, the need for an assessment will be considered case by case. We may complete an assessment for any HSB concern where this supports effective safeguarding.

The assessment will consider the victim's safety and support needs; possible other victims; the alleged perpetrator; the wider school community, including staff; the time and location of the incident; and actions needed to prevent future harm. It will be regularly reviewed and used to inform safeguarding decisions. The views of affected children and parents will be included where appropriate and safe.

Our school's assessment does not replace an assessment by social workers, police or sexual violence specialists. Professional assessments will be used to inform and update our school's arrangements.

Guiding principles

The safety of pupils is paramount. Responses will be proportionate, case-specific, non-judgemental and underpinned by robust risk and needs assessment. Inappropriate behaviour will be challenged while appropriate support is provided to all affected children.

The DSL or deputy will consider:

- the victim's wishes and as much control as reasonably possible over the response and support, balanced against the duty to protect others
- the nature of the incident and whether a crime may have been committed or HSB displayed
- the ages and developmental stages of the children
- any power imbalance, including age, maturity, confidence, disability, learning difficulty, physical size or social status
- whether the incident was isolated or part of a sustained pattern of abuse
- whether sexual violence or harassment occurred within an intimate relationship between children
- intrafamilial harm and support required by siblings
- ongoing risks to the victim, other children or staff
- wider contextual concerns, including possible links to child sexual exploitation or child criminal exploitation

We will look for patterns of concerning, problematic or inappropriate behaviour and address any environmental, systemic or curriculum issues identified.

Supporting the child who has 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 who has 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 and safeguarding other 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, to prevent bullying or harassment 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.

Options for managing a report

Every report will be considered case by case. 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. There are four possible response routes we can take:

1. 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.

This will not diminish the zero-tolerance approach to sexual harassment and sexual violence. All decisions and rationale will be recorded with staff names, date and time.

2. Universal services and community-based early help

Where statutory intervention is not required, children may benefit from universal services or community-based early help, including education, health, family hubs, youth services and voluntary or community support.

Internal management and early help may be used together for the victim and the alleged perpetrator. The DSL and deputy DSL are familiar with the Essex Effective Support procedure and portal, the current SET Procedures and local routes to support.

3. Family Help and local authority children's social care

Children and families with multiple or complex needs may require targeted early help through Family Help. This is normally voluntary and requires family consent. Family Help may also include support under section 17 of the Children Act 1989.

Where a child has been harmed, is at risk of harm or is in immediate danger, a referral will be made to Essex Children's Social Care through the Children and Families Hub in accordance with current SET Procedures.

Parental consent is not required where a statutory referral is necessary. Parents will generally be informed unless doing so could place a child at additional risk.

Our school will cooperate with statutory assessments and will not wait for an investigation to begin or conclude before protecting pupils. If statutory intervention is declined but concerns remain or circumstances change, the DSL will consider re-referral and other support.

4. Reporting to the police

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that it will be passed to the police, generally in parallel with a referral to local authority children's social care. This remains the starting point even where the alleged perpetrator is under ten; the police will take a welfare rather than criminal justice approach.

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.

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.

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.

Outcomes, sanctions and review

Widford Lodge school may take disciplinary action while police or children's social care enquiries are ongoing, provided this does not prejudice an investigation.

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child who made the report needs help or may have been abused by someone else. Disciplinary action will only be considered where there is evidence that a report was deliberately invented or malicious; an unsubstantiated report will not in itself be treated as malicious.

A police decision to take no further action, a CPS decision not to prosecute, a not-guilty verdict or withdrawal of a report does not mean that the allegation was false. Our school will continue to support the children for as long as necessary and will review the risk and needs assessment and safeguarding arrangements.

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

UK Council for
Internet Safety

An overview for all staff working in education settings in England

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 - GOV.UK](#) 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**.¹
- 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.

¹ 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).

- **Do** explain you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).