

Peer-on-Peer Sexual Abuse Policy

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1 Introduction

Our vision, underpinned by co-operative values¹, is threefold; to work in partnership with the community we serve to combat social exclusion and deprivation, to build a sustainable and vibrant community and local economy, and to provide learners with a global perspective helping them to become responsible and articulate citizens in a global economy. We will achieve this by delivering the highest possible standards of education, and for this we rely on the appropriate conduct of all our employees and volunteers.

Prior to final approval by the Trust Board this policy has been the subject to consultation with staff and pupils - their suggested amendments have been taken into consideration and changes made where they can be agreed.

2 Purpose and Scope

The purpose and scope of this policy is to give;

- Advice and guidance to staff
- Support to victims
- Support to alleged perpetrators
- Support to families

3 National context

During the Covid pandemic the national media landscape became concerned with a rise in the number of reported incidents of sexual harassment and sexual violence. These reports were highlighted after the creation of the Everyone's Invited website where the testimonies of victims were given prominence and schools were named. Arising from this source and other published research we know that;

- It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- Girls frequently report incidents of sexual harassment.
- Young people, especially girls, are reporting the increased likelihood of being pressured to share nude images of themselves in the last year, which may result in them being victimised and the recipient of unwanted sexual messages.
- Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be victims than their peers.
- Children who are lesbian, gay, bi, or trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The school is aware of the prevalence of misogynistic attitudes and behaviour in society and is committed to supporting its pupils to challenge these if they recognise them in others or in themselves.

The rest of this policy sets out;

- how the school will develop proactive approaches to supporting pupils and how teaching plans can mitigate against incidencies of sexual harassment and sexual violence (section 6);
- how the school will respond and how it will manage any disclosures made by a pupil (Sections 7 & 8);
- How the school will inform and support parents and carers (Appendix 2).

¹ self-help, self-responsibility, democracy, equality, equity, solidarity, honesty, openness, social responsibility and caring for others

4 The schools' legal responsibilities

Schools have a statutory duty to safeguard and promote the welfare of the children at their school. As part of this duty, schools are required to have regard to guidance issued by the Secretary of State. All schools must;

- Have regard to [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#).
- Have a behaviour policy and measures in place to prevent all forms of bullying.
- Teach sex and relationship education (SRE). Any school required to teach it, or academies and state-funded schools that choose to teach it, must follow the SRE [Statutory Guidance](#).
- Be aware of their obligations under the Human Rights Act 1998 (HRA).
- Comply with relevant requirements as set out in the Equality Act 2010 (the Equality Act) see [advice for schools](#) and [advice for further and higher education](#).
- Abide by the Equality Act, and must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy or sexual orientation (protected characteristics).
- Comply with the Public Sector Equality Duty (PSED) and have a general duty to have regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity between different groups and to foster good relations between different groups. The duty applies to all protected characteristics.

5 Minimising the risk of peer-on-peer sexual abuse

5.1 Trust-wide approach and accountability routes

Thrive has taken a trust-wide approach through the work of the Respectful Relationships working party established in April 2021.

All schools use the CPOMS system to log safeguarding concerns and related issues. From September 2021 there will be a coordinated way to categorise CPOMS incidents to allow for ease of data analysis and improvement planning.

Annually the Director of Safeguarding, Inclusion and SEND will report to the Trust Board on all aspects of safeguarding including levels of work in each school and the quality of responses to safeguarding concerns, including responses to peer-on-peer sexual abuse.

5.2 Whole-school approach and culture

Everyone in the school, including the governing body, all the staff, children, adult students and parents and carers are included in the school's approach to safeguarding. Safeguarding and child protection are recurrent themes running through policies and procedures. Each school's approach to peer-on-peer sexual abuse reflects and is part of the broader approach to safeguarding.

Each school's safeguarding procedures with regard to sexual violence and sexual harassment should be transparent, clear and easy to understand for staff, pupils, students, parents and carers.

Schools develop a culture which;

- Challenges inappropriate behaviours.
- Creates an understanding amongst staff, pupils and families that sexual violence and sexual harassment will not be accepted or tolerated and will not be dismissed as 'banter' or 'part of growing up' or 'just having a laugh' or 'boys will be boys'. Dismissive attitudes like these will act to normalise these behaviours.
- Support pupils who have been the victim of inappropriate behaviours, and support pupils whose

behaviour has caused concern.

5.3 Safeguarding training

As per Part One of 'Keeping Children Safe in Education', as part of their child protection and safeguarding training, schools should consider the importance of their staff being aware of the different types of abuse and neglect. Equally important is that staff know what to do if they have a concern about a child, how to respond to a report of abuse, how to offer support to children and where to go if they need support.

5.4 A Planned Curriculum

Each THRIVE school follows the [Jigsaw](#) PHSE curriculum and makes arrangements to monitor its delivery and impact. Each THRIVE school makes arrangements for an age appropriate delivery of Relationships and Sex Education. Through these means each school aims to tackle issues such as:

- healthy and respectful relationships;
- what respectful behaviour looks like;
- consent;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong.

Each school also teaches a planned programme of e-safety to give pupils the skills and knowledge they need to stay safe online both in and out of school as well as how to respond to concerns when they have them

5.5 Campaigns

Schools engage with local and national campaigns around these issues. Each school will participate in the Trust-wide events around the national campaign [White Ribbon](#) and other campaigns and initiatives.

5.6 Consult with pupils

Via planned focus group work with separate groups of boys and girls, each school will engage with pupils around key themes at an age appropriate level. These open discussions will allow for pupils to give their views on a wide range of related themes with the aim of giving schools the feedback they need to make improvements in their proactive work and pupil feedback on how well schools are responding to complaints and disclosures.

5.7 Routes for disclosure

All schools will ensure that each pupil knows who their 'go to person' is when they have a safeguarding or a pastoral need. They should also be aware of who the school's DSL and DDSL are. This information should be displayed prominently around the school.

Where a girl may not feel comfortable in approaching a male member of staff, the school will also make a female member of staff available and also ensure that girls are aware that this option is available to them.

In secondary schools, all pupils will also have the option of using email or online reporting tools such as Tootoot which will alert pastoral staff to concerns.

In primary schools, all pupils will have the option of writing any concern down and posting it in a class 'worry box' which will be looked at daily.

6 Dealing with disclosures

6.1 Complexity, sensitivity and information sharing

Reports of sexual violence and sexual harassment are likely to be complex, requiring difficult professional decisions to be made, often quickly and under pressure. Pre-planning, effective training and effective policies will provide schools with the foundation and framework for a calm, considered and appropriate response to any disclosure. Disclosures are likely to raise safeguarding concerns and they may also have a criminal element that may involve a wide range of external partners and possible criminal investigation as well as the involvement of the victim's and alleged perpetrator's family.

Disclosures will by definition require courage and will be of a sensitive nature. School staff will ensure that wherever possible disclosure by girls will be made to female members of staff and disclosures by boys to male members of staff.

Careful consideration will be given at each stage of dealing with a disclosure around how much information can be shared with parents and carers. This will be a worrying time for parents and carers and the school will support them by sharing as much information as is possible at each stage having taken advice from the DSIS and any relevant third party (police, social care etc), and will signpost them towards support assistance.

6.2 Immediate response

Where possible, manage disclosures with two members of staff present (preferably one of them being the DSL or DDSL). However, this might not always be possible. Staff must inform the DSL or DDSL as soon as practically possible, if the DSL or DDSL is not involved in the initial disclosure.

It is essential that **all** victims are reassured that they are being taken seriously, that they will be supported and kept safe. A victim should will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Staff should never make a victim feel ashamed for making a disclosure.

Staff must not promise confidentiality at this initial stage as it is very likely that the concern will have to be shared further (for example with the DSL or Children's Social Care) to agree on the next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the concern report will be passed to.

Staff will listen carefully to the child, be non-judgmental, be clear about boundaries and how the report will be progressed, not asking leading questions and only prompt the child where necessary with open questions - explain, describe, where, when, what etc.

Best practice is to wait until the end of the disclosure and then immediately write up a thorough summary in CPOMS. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes, especially if a second member of staff is present. However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.

Staff must only record the facts as the child presents them. The notes should never reflect the personal opinion of the note taker. Schools and should be aware that notes of such reports could become part of a statutory assessment by Children's Social Care and/or part of a criminal investigation.

Where the report includes an online element, being aware of [Searching, Screening and Confiscation](#) advice (for schools) and [UKCCIS sexting advice](#) for schools and. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.

Staff should follow the guidance given in the Safeguarding Policy and in the first instance staff should immediately refer to their DSL or DDSL. These in turn will refer to the Trust Director of Safeguarding, Inclusion and SEND as appropriate. These staff members will determine the response required, the immediate actions and any immediate referral routes ie Social Care and/or Police etc

A written record of each disclosure must always be made in CPOMS.

6.3 Risk and needs assessment and how to manage and/or escalate the disclosure²

DSLs, in partnership with the DSIS, will carry out a risk and needs assessment and record their decisions and actions (See Appendix 3). This assessment will enable staff to consider the risk and needs relating to the victim and the alleged perpetrator and others in the school. It is important that the completion of this document shouldn't come before any need to refer onwards.

In considering the appropriate level of response, staff may refer to the Age Appropriate Sexual Behaviours in Children and Young People Tool in the toolkit that accompanies this policy and is previewed in appendix 4.

The DSL or DDSL working in partnership with the DSIS, will decide on how to manage and/or escalate the report, including when to inform the alleged perpetrator. This depends on a number of important considerations including;

- The wishes of the victim and how they want to proceed;
- The nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages and developmental stages of the children involved;
- Any power imbalance between the children, for example, *is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?*
- Whether the alleged incident is a one-off or part of a sustained pattern of abuse.

There are 4 possible scenarios for the next steps³:

- Manage internally, where this is considered appropriate in the circumstances and Early Help or statutory interventions are not required. Relevant staff will carry out an initial investigation. ***It is crucial that the scope and depth of this internal investigation would in no way jeopardise any future statutory investigation;***
- Early Help, as outlined in Chapter 1 of Working Together to Safeguard Children, where statutory interventions are not required;
- Referral to Children's Social Care, where a child has been harmed, is at risk of harm or is in immediate danger. Schools should not wait for the outcome (or even the start) of an investigation by Children's Social Care before protecting the victim and other children in the school;
- Report to the Police (usually in parallel with a referral to Children's Social Care) where a report of rape, assault by penetration or sexual assault is made.

Whatever referral route is taken, it is very important that a written record of the referral and any surrounding conversations be made in CPOMS.

After determining next steps, schools will communicate future planned actions with parents and carers, unless this is not advised.

² See *Keeping children safe in education - Update January 2021* para. 278

³ See *Keeping children safe in education - Update January 2021* paras. 278-281

6.4 Partnership working

There are a range of partners that schools will work with during their response. It is important that in making these responses, schools refer to the DSIS.

The Police will be important partners where a crime may have been committed. Where a report of rape, assault by penetration or sexual assault is made, the starting principle is that this should be referred on to the Police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the Police remains. The Police will take a welfare, rather than a criminal justice approach in these cases.

Thrive schools will use the [EHASH](#) route for reporting to the Police.

Specialist assistance should be considered especially in the case of instances of sexual violence where social workers or sexual violence specialists should be contacted.

The DSIS will also coordinate responses with the Local Safeguarding Board in Hull, or any other Local Authority, as appropriate.

There are a number of other support services who can give support and advice to schools, pupils and parents and carers. Details are given in Appendix 2.

There may be reports where the alleged sexual violence or sexual harassment involves pupils or students from the same school, but is alleged to have taken place away from the school premises or online. There may also be reports where the children concerned attend two or more different schools. The safeguarding principles and individual schools' duties to safeguard and promote the welfare of their pupils, remain the same. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important.

6.5 Confidentiality

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The school should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children. The DSL or DDSL should consider the following:

Parents or carers should normally be informed (unless this would put the victim at greater risk) or jeopardise any future investigation.

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

6.6 Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools should be aware of anonymity, witness support and the criminal process in general so they can offer support and act appropriately. Schools should do all they reasonably can to protect the anonymity of **any** children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for

the pupils involved.

7 Ongoing response

7.1 Safeguarding and supporting the victim⁴

The support offered will depend upon;

- The age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse.
- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.
- A consideration of the proportionality of the response - support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Access to support services given in Appendix 1.

The support will include;

- Dialogue that is kept open and which is encouraged.
- Access to a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's.
- Withdrawal from lessons and activities if the victim is struggling with a normal classroom environment. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools should provide a physical space for victims to withdraw.
- Protection from bullying and harassment as a result of any report they have made.
- Alternative provision or a move to another school should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

7.2 Safeguarding and supporting the alleged perpetrator

Schools will have a difficult balancing act to consider. On one hand they need to safeguard the victim (and all other children and staff at the school) and on the other hand, provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.

A pupil abusing another pupil may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. It is important to remember that, as a child, any alleged perpetrator is entitled to, deserving of, and should be provided with, a high level of support to help them understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again.

Consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.

If the alleged perpetrator does move to another educational institution (for any reason) that the new educational

⁴ See *Keeping children safe in education - Update January 2021* paras. 282-288

institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL should take responsibility to ensure this happens as well as transferring all relevant safeguarding documentation.

7.3 Discipline and the alleged perpetrator

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur simultaneously if necessary. The school should be very clear as to what its approach is. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator, especially where there are concerns that the perpetrator themselves may have been a victim of abuse and, on the other, there are sanctions to punish a perpetrator for their past conduct. The school should be very clear as to which category any action they are taking falls or whether it is really both and should ensure that the action complies with the law relating to each relevant category.

Key consideration will include;

- Sanctions that can be implemented whilst other investigations by the Police and/or Children's Social Care are ongoing.
- Schools can make disciplinary judgements on the balance of probabilities and impose a sanction accordingly.
- Judgements will be considered on a case-by-case basis.
- The DSL or DDSL should take a leading role.
- The school should consider if, by taking any action, they would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the Police and/or Children's Social Care should help the school make a determination.
- It will be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach their own view about what happened while an independent investigation is considering the same facts.

7.4 Working with parents and carers

Key considerations will include;

- How to engage with both the victim's and the alleged perpetrator's parents or carers.
- Whether it would be prudent to have the victim present when speaking with their parents or carers.
- Whether it would be prudent to have the perpetrator present when speaking with their parents or carers.
- Whether informing a parent or carer will put a child at additional risk.
- The view of Children's Social Care and/or the Police, especially around information sharing.
- Having the DSL or DDSL present.
- How to signpost parents and carers to support agencies (Appendix 2).

7.5 Safeguarding other children

Key considerations will include;

- Supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.
- Pupils are likely to take 'sides' - how can the school do all they can to ensure both the victim and alleged perpetrator and any witnesses are not being bullied or harassed.
- How the school will guide the victim, perpetrator and the wider school community in their use of social media around the issue.
- Any potential support needs to keep all of their children safe.

8 Appendix 1: Government advice and guidance

Other advice and guidance

This advice should not be read in isolation. It is important for schools 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 sexual violence and sexual harassment:

- [Exclusions From Maintained Schools, Academies and PRUs](#) (statutory guidance)
- [Keeping Children Safe in Education](#) (statutory guidance)
- [Relationships and sex education](#) (statutory guidance for maintained schools and academies)
- [Working Together to Safeguard Children](#) (statutory guidance)
- [Behaviour and Discipline in Schools](#) (advice for schools)
- [Children Missing Education](#) (advice for schools)
- [Cyberbullying](#) (advice for schools)
- [Equality Act 2010](#) and [Public Sector Equality Duty](#) (advice for schools)
- [Mental Health and Behaviour in Schools](#) (advice for schools)
- [Preventing and Tackling Bullying](#) (advice for schools)
- [The Equality and Human Rights Commission](#) (provides advice on avoiding discrimination in a variety of educational contexts)
- [UKCIS Sexting advice](#) (advice for schools)

9 Appendix 2: Sources of specialist advice and support

Specialist Organisations	Barnardo's	UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.
	Lucy Faithfull Foundation	UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.
	NSPCC	Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.
	Rape Crisis	National charity and the umbrella body for their network of independent member Rape Crisis Centres.
	UK Safer Internet Centre	Provides advice and support to children, young people, parents, carers and schools about staying safe online.
Support for Victims	Anti-Bullying Alliance	Detailed information for anyone being bullied, along with advice for parents, carers and schools. Signposts to various helplines and websites for further support.
	Rape Crisis	Provide and sign post to a range of services to support people who have experience rape, child abuse or any kind of sexual violence.
	The Survivors Trust	UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.
	Victim Support	Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.
Toolkits	NSPCC	Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

	Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire	Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.
	Brook	Traffic Light Tool supports professionals working with children and young people, helping them to identify and respond appropriately to sexual behaviours.
Confidentiality	Gillick competence Fraser guidelines	Guidelines to help with balancing children's rights along with safeguarding responsibilities.
	NSPCC: Things to know and consider	Information sharing and confidentiality for practitioners - things to know and issues to consider.
Information Sharing	Information Commissioner's Office: Education	Information to help schools comply with General Data Protection Regulation (GDPR).
	Government information sharing advice	Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.
Further information on sexting	UKCCIS: Advice for schools and colleges responding to sexting incidents	Advice for schools on responding to incidents of 'sexting.' Supporting them in tackling the range of issues which these incidents present.
	London Grid for Learning collection of advice	Various information and resources dealing with sexting.
Support for Parents and Carers	Parentzone	Provides expert information and resources to help make the internet work for families.
	Childnet: Advice for parents and carers to keep children safe online	Advice and resources to help parents and carers keep children safe online.
	Parentsafe- London Grid for Learning	Detailed advice/resources covering various issues such as online safety, apps, and how to report concerns.
	CEOP Thinkuknow advice for parents and carers: Challenging harmful sexual attitudes and their impact Supporting positive sexual behaviour	Advice/resources on how to approach and deal with concerns about what children may be doing online. On the Thinkuknow site, this resource helps challenge harmful sexual attitudes. On the Thinkuknow site, advice on how to start a conversation to support positive sexual behaviour.

Peer-on-peer sexual abuse: risk and needs assessment and version record

Use this template to help you assess risks to the children involved in an incident of peer-on-peer sexual abuse. This document can help you meet the recommendations set out in [paragraph 255 of Keeping Children Safe in Education](#).

Notes on using this template:

1. This will be completed by the school DSL and the Trust DSIS
2. 'Child A' refers to the victim and 'Child B' refers to the alleged perpetrator
3. Consider each question/consideration from the perspective of both pupils, and be sure to do this in collaboration with them. Also consider the impact on, and needs of, the wider school community, and record any concerns or actions in the most appropriate column.
4. Be aware that this document may be used in communication with the Local Safeguarding Board and /or the Police. Add specific questions and considerations based on the nature of each incident and on the advice provided.
5. Keep track of the changes you make.
 - a. Create a new copy of the document
 - b. Update the version number at the top of the risk assessment
 - c. Record what has changed in the update log (at the end of the document)
 - d. Save the most recent version of the risk assessment in the appropriate places
6. This should be a living document – you may need to update it as often as daily based on conversations with, and feedback from, the children and parents involved, feedback from staff, guidance from the LSCB or information from the Police and Children's Social Care.

Risk assessment - with examples of 'considerations'

AREA OF RISK	CONSIDERATIONS (DELETE/RESPOND AS APPROPRIATE)	CHILD 'A' (VICTIM)	CHILD 'B' (ALLEGED PERPETRATOR)	NOTES	ACTIONS	BY WHO & WHEN
<p>Details of the incident</p> <p>Record details of the incident from the point of view of both children</p>	<ul style="list-style-type: none"> ● How serious is the incident? Was it a crime? ● Do we need to make arrangements to limit contact between the children involved? (If the allegation relates to rape, assault by penetration, or sexual assault, the answer is automatically yes) ● How did the school find out about it? Was it reported directly or by someone else with knowledge of the incident? 			<p>Use this column to record additional information that may be relevant</p> <p>For example, previous, unrelated behaviour incidents</p>		
<p>Social risks</p>	<ul style="list-style-type: none"> ● Do the children share a peer group? Are people in their friend group likely to take sides? ● Do they both attend your school? ● Do other people know about the incident? Do those people understand: <ul style="list-style-type: none"> ○ Who they can talk to if they have concerns about the people involved, or about their own safety and wellbeing ○ The importance of confidentiality ○ If, and how, they may need to be involved in any further investigations ● Are they likely to be the subject of gossip, bullying or further harassment? ● Have there been previous incidents of sexually inappropriate behaviour within their peer group(s)? ● Do they risk being alienated from their friend group(s) as a result of this incident? 					
<p>Physical risks</p>	<ul style="list-style-type: none"> ● Do they feel, or continue to feel, physically threatened by the other child? 					

	<ul style="list-style-type: none"> ● Do you have reason to believe they pose a continued risk to the safety and wellbeing of the victim, or other pupils and staff? ● Are they at risk of physical harm as a result of this incident (for example, bullying or 'retribution' by peers) ● Do they share classes/break times/etc.? ● Are they likely to come into contact with each other (or anyone else involved in/with knowledge of the incident) outside of school? How can such contact be limited? 					
Environmental risks	<ul style="list-style-type: none"> ● Do they live in a home where violence or abuse has occurred? ● Do they live in or near an area or location known to police to be high risk for sexual harassment or assault? ● Are they active on social media? If so, how? Do they know how to protect themselves from online grooming? ● What activities do they take part in outside of school? ● Are parents and carers clear about: <ul style="list-style-type: none"> ○ How the school (and partner agencies) are handling the incident? ○ Confidentiality? ○ The conduct expected of them while an investigation is ongoing? 					

DATE	RISK ASSESSMENT REVIEW - UPDATES MADE	RISK ASSESSMENT REVIEW - REASONS FOR UPDATES	UPDATES MADE BY
	E.g, "Updated lunchtime arrangements"	E.g, "Feedback from Child A"	

11 Appendix 4: Age Appropriate Sexual Behaviours in Children and Young People

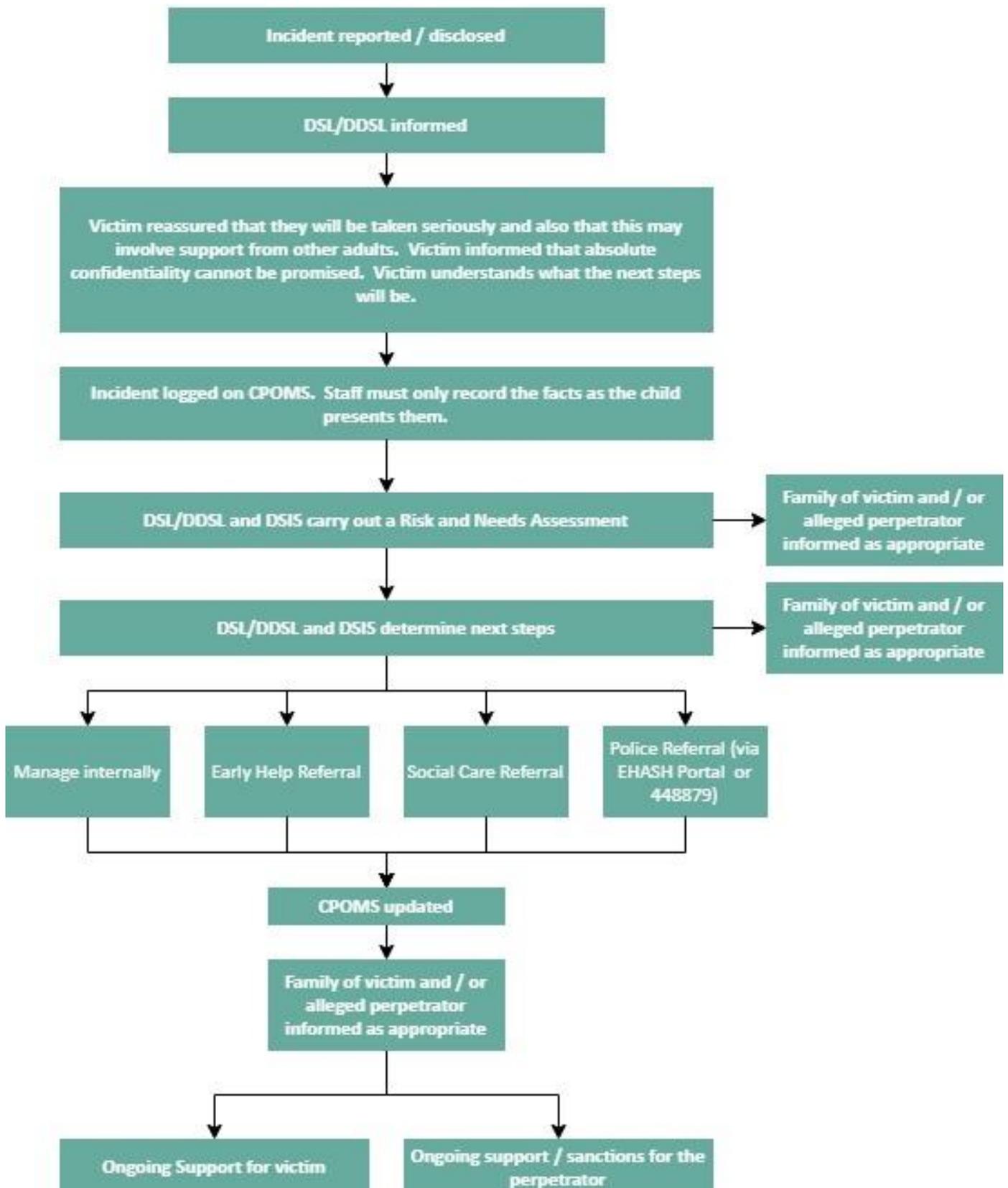
Classify the behaviour	0-4 years: infant, toddler, pre-school	5-9 years: early school years	9-12 years: pre-adolescent	13-18 years: Adolescent
<p>Age appropriate sexual behaviours</p> <p>Normal sexual behaviours are described in the boxes to the right, shaded in green.</p> <p>These behaviours may be accompanied by laughter, spontaneity, curiosity and experimentation. Children are easily diverted from these behaviours.</p> <p>Age appropriate use of technology has little or low risk for sexually abusive behaviours. This use is described here to give a context for higher risk uses described below.</p>	<ul style="list-style-type: none"> • Touching or rubbing own genitals and showing others own genitals • Touching or looking at private parts of other children or familiar adults, e.g. when in the bath • Being nude, and playing doctors, nurses or mummies and daddies • Using slang words/dirty language for bathroom and sexual functions e.g. "shit" or talking about "sexing" • Playing age appropriate games or videos on electronic devices, under supervision (low risk for sexually abusive behaviours) 	<p>There may be some crossover on age/stages</p> <ul style="list-style-type: none"> • Awareness of privacy about bodies • Self-touching and masturbation • With peers: <ul style="list-style-type: none"> ◦ "Show me yours/I'll show you mine" ◦ Stories/questions/names/swearing re private parts/body functions ◦ Kissing/holding hands, observed behaviour e.g. pinching a bottom ◦ Online social contact: skill based or dress up games • Using photos, videos to record their life • Accidental access to pornography (risk for sexually abusive behaviours) 	<p>There may be some crossover on age/stages</p> <ul style="list-style-type: none"> • Growing need for privacy • Masturbating in private • With peers: <ul style="list-style-type: none"> ◦ "Show me yours/I'll show you mine" ◦ Kissing and flirting ◦ Talking about genitals or reproduction ◦ Using dirty words or telling dirty jokes ◦ Exhibitionism e.g. occasional flashing or mooning • Having own social media accounts that are monitored by parents/carers • Using photos, videos to record their life (low risk) • Playing age appropriate games online (low risk) • Access to pornography (low risk) 	<ul style="list-style-type: none"> • Need for privacy • Masturbating in private • With peers: <ul style="list-style-type: none"> ◦ Sexually explicit conversations, obscenities or jokes relevant to own culture ◦ Sexual teasing and flirting ◦ Kissing, hugging, holding hands ◦ Foreplay with mutual consent ◦ Sexual intercourse plus full range of sexual activity with similar age partner • Viewing sexual content for arousal (low risk) • Sending/receiving sexual images of others with consent (low risk)
<p>Concerning sexual behaviours</p> <p>Concerning sexual behaviours are described in the boxes to the right, shaded in orange.</p> <p>The frequency and persistence of these behaviours should be monitored.</p> <p>Seek professional advice if a child or young person exhibits several of these behaviours, and/or the behaviours continue despite clear requests to stop.</p> <p>Risks with technology use include less time with peers, grooming, viewing inappropriate content.</p>	<ul style="list-style-type: none"> • Keeps masturbating after being told to stop • Forcing another child to engage in sexual play • Sexualised play with dolls, e.g. "humping" a teddy bear • Touching the private parts of an animal or an unfamiliar adult • Following other children into a toilet or bathroom to look at or touch their private parts • Spending a lot of time using technology and being upset when devices are removed (risk of inappropriate content and contacts) 	<ul style="list-style-type: none"> • Continually rubbing/touching own genitals in public • Persistent nudity and/or exposing private parts in public • Continually wanting to touch other children's private parts • Persistently using dirty words • Wanting to play sex games with much older or younger children • Sending/receiving "dick" pics (exploitation risk) • Accessing pornography and playing violent or sexual video games (risks: grooming, lowers inhibitions) • Having own social media accounts and spending a lot of time online (risks: grooming, less time with peers, inappropriate posts) 	<ul style="list-style-type: none"> • Attempting to expose other people's genitals • Pre-occupation with masturbation • Mutual masturbation with a peer or group • Simulating foreplay or intercourse with peers, with clothes on • Sexual knowledge too great for their age, when the context is considered • Talking about fear of pregnancy or sexually transmitted infection • Peeing, exposing*, using obscenities • Seeking out pornography • Taking nude, sexual images of themselves • Secretive about using the internet/social media (risk of being groomed or exploited) 	<ul style="list-style-type: none"> • Being pre-occupied with/anxious about sex • Being promiscuous • Being interested in or using themes or obscenities involving sexual aggression • Spying on others who are nude or engaged in sexual activity • Engaging in unsafe sexual behaviour • Seeking out pornography • Having oral sex or intercourse with someone more than 2 years older/younger* • Sending/receiving sexual images of multiple people with their consent*
<p>Very concerning sexual behaviours</p> <p>Very concerning behaviours are described in the boxes to the right, shaded in red.</p> <p>Seek professional advice, especially if a child or young person is also secretive, anxious or tense - or if coercion, compulsion or threats are involved.</p> <p>Some of these behaviours become criminal offences when a young person reaches the age of criminal responsibility (10 years of age in Victoria, Australia). Report criminal offences to the police immediately.</p> <p>Technology use risks include: grooming, sexual assault, pornography, exploitation and prostitution.</p>	<ul style="list-style-type: none"> • Persistently touching or rubbing self to the exclusion of normal childhood activities; hurting own genitals by rubbing or touching • Simulating sex with other children with or without clothes on • Oral sex • Sexual play involving forceful anal or vaginal penetration with objects • Accessing sexual material online 	<ul style="list-style-type: none"> • Touching or rubbing self persistently in private or public, to the exclusion of normal childhood activities • Rubbing their genitals on other people • Forcing other children to play sexual games • Sexual knowledge too great for age • Talking about sex and sexual acts habitually • Posting sexual images or videos online • Accessing/showing pornography to others • Cyber bullying others using intimate images to extort other children • Grooming other children • Meeting online 'friends' face to face (risk of sexual assault) 	<ul style="list-style-type: none"> • Compulsive masturbation, including interrupting tasks to masturbate • Repeated/chronic peeing*, exposing, using obscenities • Chronic interest in adult/child pornography* • Making others watch pornography • Degrading/humiliating self or others using sexual themes • Touching other children's genitals without permission* • Forcing others to expose their genitals • Making written or verbal sexually explicit threats* • Simulating intercourse with peers, unclothed • Penetration of dolls, other children or animals* • Taking nude sexual images of others • Sharing nude sexual images of themselves • Having suggestive avatars (online characters) or usernames (risk of grooming) • Meeting online 'friends' face to face 	<ul style="list-style-type: none"> • Compulsive masturbation • Masturbation in public* • Degrading/humiliating self or others using sexual themes • Chronic preoccupation with sexually aggressive pornography/child pornography* • Attempting to expose other people's genitals • Touching others' genitals without permission* • Making written/verbal sexually explicit threats* • Making obscene phone calls, exhibitionism, voyeurism, or sexually harassing others* • Sexual contact with much younger people* • Sexual contact with animals* • Penetrating another person forcefully* • Taking sexual images of others to exploit them* (child pornography, exploitation risk) • Having multiple nude images of others (risks as above plus exploitation)

The tool acts as a reference for staff when dealing with relevant behaviour, helping to acknowledge and identify the behaviour in the context of what is considered to be age appropriate.

The tool is not an identification tool for Child Sexual Exploitation and, together with staff training, should be used to complement existing Safeguarding procedures - the tool does not replace these.

A usable and more readable version of this document is available in the toolkit that accompanies this policy.

12 Appendix 5: Managing a Disclosure Flow Chart



13 Appendix 6: Definitions and acronyms⁵

- **Peer-on-peer sexual abuse** is abuse that involves sexual violence and/or sexual harassment between children. They may be children at the same school or not.
- **Sexual violence.** For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 :
 - **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
 - **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
 - **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- **Sexual harassment.** This is ‘unwanted conduct of a sexual nature’ that can occur online and offline. 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. Sexual harassment can include;
 - sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance⁵ and calling someone sexualised names;
 - Sexual ‘jokes’ or taunting;
 - physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature;
 - online sexual harassment. It may include:
 - non-consensual sharing of sexual images and videos. ([UKCIS](#) sexting advice provides detailed advice for schools);
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;
 - sexual exploitation; coercion and threats.
- **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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online also (both physically and verbally) and are never acceptable.
- **Consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. 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.
- **Harmful sexual behaviour** when considering harmful sexual behaviour, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Harmful sexual behaviour **can**, in some cases, progress on a continuum. Addressing inappropriate behaviour

⁵ Taken from [Sexual violence and sexual harassment between pupils in schools and colleges \(2018\)](#)

can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviour have often experienced their own abuse and trauma.

- Alongside these definitions we also include;
 - Upskirting: taking a picture under a person's clothing without them knowing to obtain sexual gratification or cause the victim humiliation, distress or alarm.
 - Sexting: the sending indecent images (pictures and/or videos) of oneself or others or sending sexually explicit messages. Sexting is commonly known as "trading nudes", "dirties" or "pic for pic".
 - Initiation or 'hazing': any activity expected of someone in joining or participating in a group that humiliates, degrades, abuses or endangers them regardless of a person's willingness to participate.
- **'Victim'** we recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way.
- **'Alleged perpetrator' and where appropriate 'perpetrator'** we use these terms in this policy and in professional dialogue but only will think carefully before using this terminology, especially when speaking in front of children.
- **DSL and DDSL** - Designated Safeguarding Lead and Deputy Designated Safeguarding Lead. This is the person in school who is responsible for ensuring that the school responds well to safeguarding concerns.
- **DSIS** - Director of Safeguarding, Inclusion and SEND. This is the person responsible for safeguarding issues across the 9 schools in THRIVE.
- **Thrive** - Thrive Co-operative Learning Trust, a multi academy trust of 9 schools in Kingston upon Hull.
- **PSHE** - Personal, Social, Health and Economic education.
- **RSE** - Relationships and Sex Education.