

Wellington College

Academic Year 2023-2024



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Policy should be reviewed annually and review details included in italics at the end of the policy together with the initials of who reviewed the policy. Any amendment mid-year also to be tracked at the bottom of the policy.

All policies to use the font Gill Sans MT font size 11.

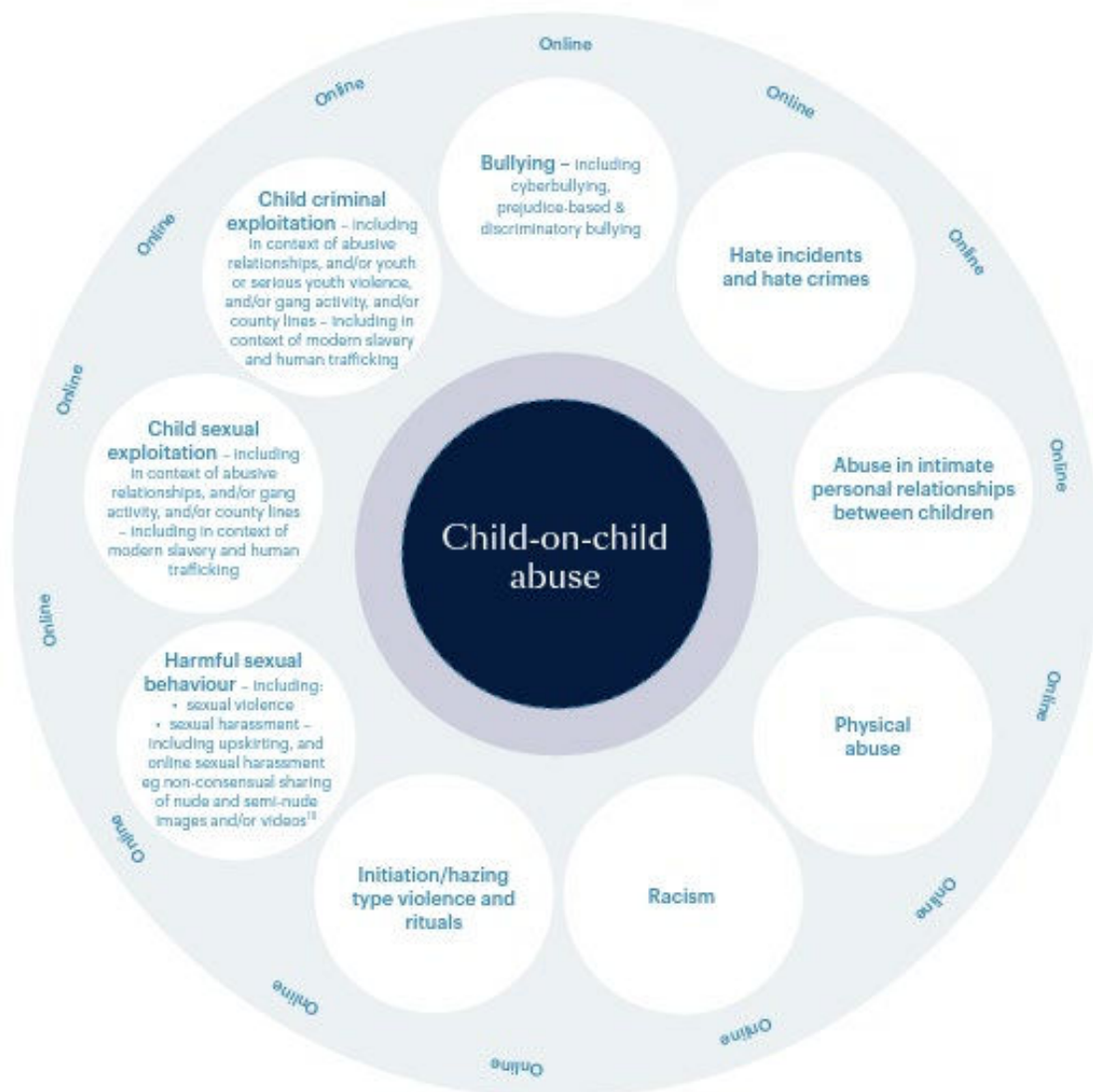
Child-on-Child Abuse: College Policy

This policy should be read in conjunction with the College's other disciplinary and safeguarding policies, copies of which can be found on MyDay and the Parent Portal.

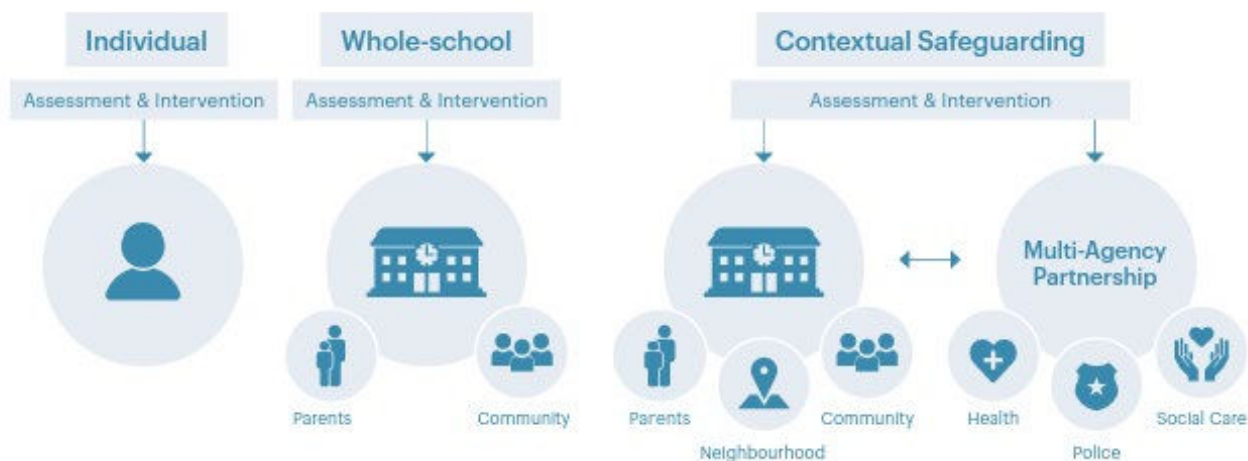
At Wellington College, our community is based upon the College Values of kindness, courage, integrity, responsibility and respect. We are committed to providing a safe and caring environment that is free from any form of child-on-child abuse so that every one of our pupils can develop to their full potential. All pupils should care for and support each other, inside and outside of College.

This policy is available to parents of pupils on the Parent Portal and is available on request to prospective parents. It is also communicated to all staff and pupils and is available on MyDay. The College may amend this policy from time to time and without notice. MyDay and the Parent Portal should be checked on a regular basis for updates.

In the absence of a designated member of staff, any references in this policy shall be to the member of staff to whom they have delegated their authority during their absence.



What does a contextual safeguarding approach look like?



A. INTRODUCTION

The Governors, Executive Leadership Team, and all staff and volunteers at Wellington College are committed to the prevention, early identification and appropriate management of child-on-child abuse (as defined below) both within and beyond the College.

In particular, we believe that in order to protect all of our students, all of those who are members of the College community should:

- (a) Be aware of the level and nature of risk to which our students are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context;
- (b) Take a contextual whole-school approach to preventing and responding to child-on-child abuse;
- (c) Regard the introduction of this guidance as a preventative measure, and do not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents;
- (d) Recognise national and increasing concern about this issue, and wish to implement this policy in order to ensure that our students are safe, are listened to and that all reports taken seriously;
- (e) Recognise that even if incidents are not being reported, it should be assumed that all forms of child-on-child abuse are happening within the College – it could be the case that issues are not being reported. All staff should be alert to the signs and symptoms and report any concerns to the DSL or a deputy;
- (f) Understand the importance of challenging inappropriate behaviours between children and not downplay them, dismissing them as “banter” or “part of growing up”;
- (g) Encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any other child, they should inform the College so that it can ensure that appropriate and prompt action is taken in response;
- (h) Understand that there are additional factors to consider with regards to child-on-child abuse within the context of a boarding school setting.

This policy sets out our strategy for preventing, identifying and appropriately managing child-on-child abuse. It applies to all members of the College community and will be reviewed annually to ensure that it continually addresses the risks to which students are or may be exposed. Research has shown

that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of others. Therefore, the College takes a safeguarding approach to all individuals involved in allegations of, or concerns about child-on-child abuse, including those who are alleged to have been abused and those who are alleged to have abused another child, looking to support all of those involved whilst also considering whether any disciplinary sanctions should be imposed. This policy deliberately does not use the term 'victim' and/or 'perpetrator'.

Although the starting point is that the College's response to child-on-child abuse should be the same for all students regardless of age, there may be some additional considerations in relation to a pupil aged 18 or over in terms of how local agencies and/or partners respond.

Similarly, the College's response to incidents involving the exchange of youth-produced sexual imagery will need to differ depending on the age of the students involved (see information on sexual imagery).

This policy is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (September 2023) and the College's own Sexual Violence and Sexual Harassment Policy and Guidance and meets the requirements of the ISI. The Farrer & Co 'Addressing child-on-child abuse: a resource for schools and colleges' has also been used for reference.

B. WHEN DOES THIS POLICY APPLY?

This policy applies to all pupils at the College, whether day or boarding. The policy applies regardless of whether the abuse takes place at College or elsewhere, in person or online.

C. WHAT IS CHILD-ON-CHILD ABUSE?

Child-on-child abuse can be defined as "any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate)." (Firmin, C. 2017. Abuse Between Young People: A Contextual Account). The DfE defines child-on-child abuse as "abuse by one child of another child – regardless of the age, of the stage of development, or any differential between them." (KCSIE, 2023)

Child-on-child abuse can take various forms (but not limited to) (KCSIE, 2023):

- (a) Bullying – including cyberbullying, prejudice-based and discriminatory bullying.
- (b) Hate incidents and hate crimes – which may also include an online element.
- (c) Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse') – which may also include an online element. Physical abuse – such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- (d) Racism – occurs when a person is treated less favourably because of their skin colour, nationality, ethnicity, or cultural group. Racist behaviour can include verbal abuse, physical attacks, exclusion from activities or opportunities and microaggressions, which can be conscious and unconscious. It can occur in person or online.
- (e) Harmful sexual behaviour (HSB) - developmentally inappropriate sexual behaviour which is displayed by children and young people which is harmful or abusive. HSB can occur online and/or face to face, and can also occur simultaneously between the two. Many types of HSB can constitute a criminal offence and others may, if they are non-consensual, also breach other laws such as breach of privacy, data protection legislation, Malicious Communications Act 1988, or

constitute stalking or harassment under the Protection from Harassment Act 1997. Types of HSB include, for example:

- i. Sexual violence – such as rape, assault by penetration, sexual assault (which may include an online element which facilitates, threatens and/or encourages sexual violence) and causing someone to engage in sexual activity without consent (such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party);
 - ii. Sexual harassment - which is ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college – can include (but is not limited to):
 - sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names, intrusive questions about a person’s sex life, and spreading sexual rumours;
 - sexual “jokes” or taunting;
 - suggestive looks, staring or leering;
 - sexual gestures;
 - physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim);
 - displaying pictures, photos or drawings of a sexual nature,
 - iii. Online sexual harassment - this may be stand-alone or part of a wider pattern of sexual violence and/or harassment. It may include:
 - 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;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including on social media, sexual exploitation, coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they are not comfortable with online.
 - iv. Upskirting – which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm and is a criminal offence.
- (f) Initiation/hazing type violence and rituals – this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.
- (g) Child exploitation – forms of abuse that occur when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. It is usually considered to fall into two categories:
- i. Child sexual exploitation (CSE) – including in the context of abusive relationships, and/or gang activity, and/or county lines – including in the context of modern slavery and human trafficking; and/or
 - ii. Child criminal exploitation (CCE) – including in the context of abusive relationships, and/or youth or serious youth violence, and/or gang activity, and/or county lines – including in the context of modern slavery and human trafficking.

CSE and CCE can affect children, of any gender, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. CSE and CCE do not always involve physical contact; CSE and CCE can also occur through the use of technology.

Abuse may take place face to face or online. Online child-on-child abuse is any form of child-on-child abuse where an element might be facilitated by digital technology, for example, consensual and non-consensual sharing of nude and semi-nude images and/or videos (sometimes called 'sexting'), online abuse, coercion and exploitation, child-on-child grooming, threatening and hate speech delivered via online means, the distribution of sexualised content (which might be youth-produced, commercial pornography or pseudo sexual images), and harassment.

D. HOW CAN A CHILD WHO IS BEING ABUSED BY THEIR PEERS BE IDENTIFIED?

Wellington College expects all of its staff to be vigilant in respect of the dynamics of peer groups in the College, and to be alert to the wellbeing of students and to signs of abuse. They should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. Staff know to be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ. Staff are trained to be aware that signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include – for example:

- (a) being afraid of particular places and/or situations and/or making excuses to avoid particular people
- (b) being afraid/reluctant to go to school, being mysteriously 'ill' each morning, or skipping school
- (c) running away or regularly going missing from home, care or education
- (d) experiencing difficulties with mental health and/or emotional wellbeing
- (e) becoming nervous, anxious, distressed, clingy or depressed
- (f) becoming isolated from peers/usual social networks, losing confidence and becoming withdrawn
- (g) self-harming or having thoughts about suicide
- (h) having problems eating (including developing eating disorders) and/or sleeping (including suffering from nightmares)
- (i) regularly wetting the bed or soiling their clothes
- (j) belongings getting 'lost' or damaged
- (k) asking for, or stealing, money (to give to a bully)
- (l) unexplained gifts, money or new possessions (eg clothes and/or mobile phone)
- (m) unexplained physical injuries and other signs of physical abuse
- (n) changes in appearance – eg weight loss
- (o) changes in performance and/or behaviour at school
- (p) knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example, alcohol, drugs and/or sexual behaviour
- (q) involvement in abusive relationships
- (r) involvement in gangs or gang fights
- (s) having angry outbursts, or behaving aggressively or abusively (including displaying harmful sexual behaviour) towards others

The College recognises that abuse affects children very differently, that the above list is by no means exhaustive, and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Concerns may also of course be raised by parents, peers, and others.

Rather than checking behaviour against a list, all staff at Wellington are trained to be alert to behaviour that might cause concerns, to use their professional curiosity and think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour (by

asking open questions at the right time to prompt discussion) and, where appropriate, to engage with their parents so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for their age, staff are expected to consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards. The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of child-on-child abuse a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

Further detail about the College response to the sharing of nudes and semi-nudes can be found in the College Sexual Violence and Sexual Harassment Policy and Guidance.

E. ARE SOME PUPILS PARTICULARLY VULNERABLE TO ABUSING OR BEING ABUSED BY THEIR PEERS?

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. However, as individual and situational factors can increase a child's vulnerability to being abused by or abusing their peers, the College considers all relevant factors when dealing with instances of child-on-child abuse. This means that, when investigating an incident, supporting those involved and considering any appropriate sanctions as well as when considering whether incidents are being reported and reviewing this policy and its outcomes, the College will recognise and consider:

- (a) that certain children may face additional barriers to reporting an incident because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- (b) that pupils with SEND or certain health conditions can face additional safeguarding challenges and may be more prone to child-on-child group abuse;
- (c) that children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers;
- (d) that child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up;
- (e) intersectionality, that is the recognition that people's experiences are shaped by their multi-layered identities. A person's interactions with the world are shaped by their sex, ethnicity, age, gender, sexuality, disability, class, socio-economic status and abilities, and these aspects of a person's identity interrelate. Someone may experience racism, sexism and ageism collectively or individually at different times and in different environments. For example, a teenage Black boy may experience discrimination based on the fact that he is both Black and male. The effect of his experiences may influence whether he is comfortable accessing support if he is a victim of child-on-child abuse;
- (f) as part of (b) above, adultification. This is a form of racial prejudice in which children from minoritised groups are treated as more mature than they actually are by a reasonable social standard of development. This may lead to failure to recognise victims of child-on-child abuse and to respond appropriately to the experiences of children from minoritized ethnic groups. Whilst adultification can impact all children in certain ways it is important that there is an acknowledgement that it specifically affects Black children. Their behaviour may also attract a harsher disciplinary response than the same behaviour in white peers of the same age. To address

this risk, behaviour policies should be applied consistently and behaviour sanctions regularly reviewed for evidence of discrimination against children from minoritized ethnic groups.

- (g) that those who have already been subject to abuse are more vulnerable to further abuse. For example, an image of a child could be shared, following which they could become more vulnerable to child-on-child abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family;
- (h) that peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to child-on-child abuse.

To ensure that this is considered appropriately in connection with each incident of child-on-child abuse, prior to starting an investigation into an alleged incident, the relevant staff will check iSams for relevant information and, where appropriate, seek advice from the pastoral and/or safeguarding teams.

The College recognises that the types of child-on-child abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being physically abused by a family member or by older boys. Equally, sexual bullying in schools and other settings can result in the sexual exploitation of children by their peers. For 16 and 17 year olds who are in abusive relationships, what may appear to be a case of domestic violence may also involve sexual exploitation. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to child-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences.

F. HOW DOES THE COLLEGE DETERMINE IF BEHAVIOUR CONSTITUTES ABUSE?

The College will investigate any reported incident to determine if it constitutes child-on-child abuse and whether any sanctions are appropriate. In determining this, the staff involved in the matter will rely on their extensive experience.

The College recognises that all behaviour takes place on a spectrum. Therefore, the College will investigate any alleged incident of child-on-child abuse to understand where it falls on the spectrum in order to be able to respond appropriately in supporting those involved and, where appropriate, imposing sanctions. To do this, staff involved will rely on their extensive experience and may also refer to the Hackett continuum model.

I. Sexual behaviours

As the NSPCC explains “children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB.”

Hackett proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a pupil's sexual behaviour and deciding how to respond to it.

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviour • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not able to be freely given • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour • Sadism

Staff should always use their professional judgment and discuss any concerns with the DSL. Where an (alleged) incident involves a report of sexually harmful behaviour, staff should consult the DfE's Advice (KCSIE, 2022 Part 5) and the College Sexual Violence and Sexual Harassment Policy and Guidance.

2. Other behaviour

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

- Is socially acceptable
- Involves a single incident or has occurred over a period of time
- Is socially acceptable within the peer group
- Is problematic and concerning
- Involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability
- Involves an element of coercion or pre-planning
- Involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power
- Involves a misuse of power

It should be borne in mind that behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and addressing any inappropriate behaviour which may be displayed by a child is vital, and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two students may not constitute child-on-child abuse where the fight is a one-off incident, but may be abusive where the child's/children's behaviour

subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual student basis, but could also apply across the student body. Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which the College may need to adopt a whole-school approach in order to prevent escalation. For example, where multiple boys are making inappropriate comments about girls, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise or a house-based discussion with a tutor.

If there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern(s)/allegation(s) is considered or suspected by the DSL to constitute child-on-child abuse, the College will follow the procedures set out below.

G. WHAT MEASURES DOES THE COLLEGE TAKE TO RAISE AWARENESS OF AND REDUCE CHILD-ON-CHILD ABUSE?

The College actively seeks to raise awareness of and prevent all forms of child-on-child abuse by educating all Governors, staff, volunteers, students and parents about this issue. This includes:

- (a) Training all Governors, Executive Leadership Team, staff and volunteers on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it.
- (b) Educating students about the nature and prevalence of child-on-child abuse via Well-being lessons, outside speakers and the wider curriculum. Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the School's approach to such issues, including its zero-tolerance policy towards all forms of child-on-child abuse.
- (c) Engaging parents on this issue by holding pastoral talks on Saturday mornings and encouraging parents to hold the College to account on this issue.
- (d) Ensuring that all child-on-child abuse issues are fed back to the DSL, Deputy Head (Pastoral & Wellbeing) so that they can spot and address any concerning trends and identify students who may be in need of additional support. Both the DSL and Deputy Head (Pastoral & Wellbeing) will liaise closely with the Second Master on all matters concerning child-on-child abuse
- (e) Challenging the attitudes that underlie such abuse (both inside and outside the classroom);
- (f) Working with Governors, Executive Leadership Team, all staff and volunteers, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community;
- (g) Creating conditions in which our students can aspire to and realise safe and healthy relationships;
- (h) Creating a culture in which our students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to;
- (i) Responding to cases of child-on-child abuse promptly and appropriately;

As well as investigating any alleged incidents of child-on-child abuse promptly (see below), the College monitors recorded incidents and considers whether there are any patterns to the incidents or lessons to be learned.

In addition to the above, the College also has the following specific measures in place:

1. Pupils

- (a) All pupils have access to an independent person, enabling them to contact someone for support in private. The independent person is Judy Waugh who can be contacted on 07778 751 686 or independentlistener@wellingtoncollege.org.uk
- (b) The College buildings and all of our boarding houses display advice on where pupils can seek help, including details of confidential help lines and websites where they can connect with external specialists, such as ChildLine, Kidscape, Bullying UK, and the Samaritans;
- (c) We provide leadership training to both our College Prefects and our House Prefects which specifically covers the importance of offering support and assistance to younger and to vulnerable pupils; and
- (d) Talks to pupils emphasise that the College does not tolerate peer-group 'initiation ceremonies' or hazing type violence or rituals designed to cause pain, anxiety or humiliation to pupils, and all staff remain alert to such actions.
- (e) In respect of cyber-bullying:
 - expects all pupils to adhere to its Acceptable Use Policy and Policy on Use of Mobile Devices. Certain sites are blocked by our filtering system and our IT Department monitors pupils' use;
 - issues all pupils with their own personal College email address, offers guidance on keeping names, addresses, passwords, mobile phone numbers and other personal details private and secure and around blocking, removing contacts from friend lists and sharing their personal data
 - in accordance with the Policy on the Use of Mobile Devices, expects mobile phones to be used responsibly, safely and respectfully and, for 3rd, 4th and 5th Formers, only at certain times.

2. Staff

- (a) Upon induction, all new members of staff are given training and guidance on the College's Child-on-Child Abuse policy and on how to react to, and record allegations of bullying at the College (including cyber bullying and sexual violence and harassment). The College will ensure that all College staff understand the principles of the College's policy, the College's legal responsibilities, actions to be taken to resolve and prevent incidents of child-on-child abuse from arising or escalating and also details of sources of further support;
- (b) Our trained Counsellors are an important part of our pastoral support service, providing specialist skills of assessment and counselling. They are available to give confidential advice and counselling support to pupils who can refer themselves to the Counsellors when they have social, emotional or behavioural concerns. On occasion, a member of our pastoral team may refer a pupil to the Counsellors as appropriate; and the College Counsellors may be integral to providing support for both the alleged victim/s and alleged perpetrator/s,
- (c) The College Chaplain will give support and guidance to pupils of all faiths and none, who are able to refer themselves to the Chaplain whenever they wish (for example, at a time of family break-up, sickness or bereavement). The Chaplain will provide confidential advice and seek to encourage the development of tolerance, understanding and respect for others in a multi-faith community and may also be called upon to provide support for the alleged victim and perpetrator;

In boarding houses, there are strong teams of tutors supporting the House Master/Mistress and the Matrons, who act in loco parentis. Staff are aware that, by their nature, a boarding house environment provide more opportunities for bullying, and are therefore always vigilant and alert to signs of issues with or between boarders. The house environment is important in reinforcing a pupil's standards and values, providing the opportunity for friendly, informal discussion of matters of concern to the individual pupil outside the formal classroom. A member of the boarding house staff is always on duty to supervise the pupils. The College will comply with its obligations as set out in the [National minimum standards for boarding schools \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/national_minimum_standards_for_boarding_schools.pdf)

3. Parents

- (a) This policy is readily available on the Parent Portal so that they are clear on the College's approach to child-on-child abuse and what to do if their child experiences child-on-child abuse;
- (b) We encourage close contact between the House Master/ Mistress and parents, and will always make contact if we are worried about a pupil's well-being;
- (c) If parents know or suspect that their child, or another pupil, is being subject to child-on-child abuse, they should contact the College without delay. All concerns will be taken seriously; and
- (d) We welcome feedback from parents on the effectiveness of our preventative measures and all other aspects and implementation of the child-on-child abuse policy.

4. Multi-agency working

The College actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, Bracknell Forest Local Authority and MASH team, Children's Social Care, Thames Valley Police and/or other relevant agencies, and other schools. The relationships the College has built with these partners are essential to ensuring that the College is able to prevent, identify early and appropriately handle cases of child-on-child abuse.

The College actively refers concerns/allegations of child-on-child abuse where necessary to the relevant agencies listed above. It considers this to be particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

H. HOW DOES THE COLLEGE RESPOND TO CONCERNS OR ALLEGATIONS OF CHILD-ON-CHILD ABUSE?

I. General principles

It is essential that all concerns/allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our College environment. Any response should:

- (a) As detailed above, include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- (b) follow a Contextual Safeguarding approach (see below);
- (c) treat all children involved as being at potential risk-- while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. The College will ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse,

and the child who has allegedly been responsible for it as well as considering any appropriate sanctions for the latter.

- (d) take into account that the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. Should the child not wish for their parents to be informed, their wishes will be taken seriously and discussed within the safeguarding team and external advice sought. The College will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

2. What is Contextual Safeguarding?

Contextual Safeguarding is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation, and serious youth violence. It recognises that as children enter adolescence they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse. Additionally, it considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a school, professionals could work with the school leadership and student body to challenge harmful school cultures, thus improving the pre-existing school environment.

I. WHAT SHOULD STAFF DO IF THEY SUSPECT EITHER THAT A CHILD MAY BE AT RISK OF OR EXPERIENCING ABUSE OR THAT A CHILD MAY BE AT RISK OF ABUSING OR MAY BE ABUSING ANOTHER CHILD/CHILDREN?

If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. The member of staff will seek to control the situation, to reassure and support the pupils involved without promising absolute confidentiality and will report the incident to Assistant Head (Pupils), Safeguarding Team and / or HM as soon as possible. The incident will be logged on MyConcern.

If a pupil is in **immediate danger**, or at risk of significant harm, the member of staff should make a referral to children's social care (if the pupil is aged under 18) and/or the police immediately and then inform the DSL. The DSL will inform other relevant members of staff, for example the student's HM and any subsequent investigation will be carried out under the Investigations Policy.

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. DSLs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact Bracknell Forest MASH team immediately, and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss

the allegations/concerns with Bracknell Forest MASH team and agree on a course of action, which may include:

- (a) Manage internally with help from external specialists where appropriate and possible
- (b) Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family. These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services
- (c) Refer child/children to Children's Social Care for a section 17 and/or 47 statutory assessment
- (d) Report alleged criminal behaviour to the Police and refer to "when to call the police guidance" from the NSPCC

Alleged criminal behaviour will ordinarily be reported to the Police. However, there are some circumstances where it may not be appropriate to report such behaviour to the Police. For example, where the exchange of youth-produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

1. Individual risk and needs assessment

Where there is an incident of child-on-child abuse, the College will carry out a robust risk and needs assessment in respect of each child affected by the abuse, this includes both the alleged victim and the alleged perpetrator. These risk assessments will:

- (a) Assess and address the nature and level of risks that are posed and/or faced by the child
- (b) Engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term¹
- (c) Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child
- (d) Be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

If, at any stage, the child's needs escalate, the DSL should contact Bracknell Forest MASH team to determine the appropriate course of action.

2. Disciplinary action

The safeguarding and disciplinary teams may recommend the Dialogue Road Map instead of (or as well as) disciplinary approaches. Dialogue Road Map is a confidential, compassionate and supportive resource for the Wellington Community. It can be used to manage a child-on-child abuse issue in a restorative way, with the consent of those involved.

The College will consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including:

- (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- (b) to demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and
- (c) to ensure the safety and wellbeing of other children.

¹ unless the child has expressly indicated that they do not want their parents informed and this has been discussed by the safeguarding team and an external advisor.

However, these considerations must be balanced against the child's/children's own potential unmet needs and any safeguarding concerns.

Before deciding on appropriate disciplinary action, the College will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it. The College will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required. Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the College.

Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the College will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards.

3. Recording

All child-on-child abuse incidents will be recorded on MyConcern. This enables regular reporting and review by the safeguarding team as well as presenting figures to the Governing Body when required. A separate log of disciplinary action arising from child-on-child abuse is kept by the Second Master.

J. COMPLAINTS PROCEDURE

If parents feel that any concerns about child-on-child abuse (or anything else) have not been addressed properly, they should raise this in accordance with the Complaints Procedure, a copy of which can be found on the College's website.

D. A. Lynch, September 2023

[This policy was drawn together in order to combine the Child-on-child abuse Policy and the Anti-bullying Policy]

SCHEDULE I

PREVALENCE OF TYPES OF BULLYING

PREVALENCE

Bullying: Ditch the Label's Annual Bullying Survey 2020 found that:

- 25% of over 13,000 12 to 18 year olds reported having been bullied in the last 12 months (the number of victims has increased by 25% compared to 2019, in which a quarter of those bullied saying they'd received physical and online attacks).
- Of the 25%, 9% reported that the bullying occurred daily, 13% reported that it occurred several times a week, and 8% said weekly.
- Of this 25%, 47% felt they were bullied because of attitudes towards their appearance and 11% felt it was because of attitudes towards their sexuality.
- In relation to the impact of bullying, 44% of those who reported being bullied in the last 12 months said it left them feeling anxious, 36% said it left them feeling depressed, 33% had suicidal thoughts, 27% had self-harmed and 18% truanted from school/college.

Online bullying: The Office for National Statistics Online bullying in England and Wales: year ending March 2020, found that:

- Around one in five (19%) 10 to 15 year olds experienced at least one type of online bullying behaviour – equivalent to 764,000 children. More than half (52%) of those children who experienced online bullying behaviours said they would not describe these behaviours as bullying, and one in four (26%) did not report their experiences to anyone.
- Being called names, sworn at or insulted and having nasty messages about them sent to them were the two most common online bullying behaviour types, experienced by 10% of all children aged 10 to 15 years.
- Nearly three out of four children (72%) who had experienced an online bullying behaviour experienced at least some of it at school or during school time.

Harmful sexual behaviour: Ofsted found, in its Review of sexual abuse in schools and colleges, June 2021, that the girls who responded to its questionnaire indicated that the following types of harmful sexual behaviour happened 'a lot' or 'sometimes' between people their age:

Non-contact forms, but face-to-face:

- sexist name-calling – 92%
- rumours about their sexual activity – 81%
- unwanted or inappropriate comments of a sexual nature – 80%

Non-contact forms, online or on social media:

- being sent pictures or videos they did not want to see
- being put under pressure to provide sexual images of themselves – 80%
- having pictures or videos that they sent being shared more widely without their knowledge or consent – 73%
- being photographed or videoed without their knowledge or consent – 59%
- having pictures or videos of themselves that they did not know about being circulated – 51%

Contact forms:

- sexual assault of any kind – 79%
- feeling pressured to do sexual things that they did not want to – 68%
- unwanted touching – 64%

Ofsted states that: “these findings are strongly supported by existing research into harmful sexual behaviour between peers.”

SCHEDULE 2

VICTIM BLAMING

What is victim blaming?

Victim blaming is any language or action that implies (whether intentionally or unintentionally) that an individual is partially or wholly responsible for abuse that has happened to them. It is harmful and can wrongfully place responsibility, shame or blame onto a victim, making them feel that they are complicit or responsible for the harm that they have experienced. People of all ages can display victim blaming attitudes and it can happen when considering both online and offline incidents.

Why is victim blaming harmful?

One of the greatest barriers to a child or young person seeking help and reporting child-on-child abuse, is feeling that they are to blame for what is happening to them. When a professional working with the child or young person speak or behave in such a way that this reinforces this feeling of self-blame, the impact of the abuse that the individual has already experienced may be greater.

When victim blaming occurs, there is a risk of diminishing the individual's experiences leading to a lack of, or an inappropriate, safeguarding response. This can have a devastating impact for the young person or child and make it less likely that they – or their peers - will disclose abuse in the future.

How does victim blaming present?

Victim blaming may be direct or indirect. Direct victim blaming happens when a child or young person is explicitly held responsible for what has happened to them. Indirect victim blaming is harder to identify but happens when a person is trying to 'help' following an incident. However, the 'help' that is given reinforces the idea that the child or young person has done something wrong or is responsible for what happened to them.

Some examples:

Direct victim blaming:

A boy in the 3rd form is suffering child-on-child online abuse from some other boys in his year group through an online gaming platform. When he raises this, his parents and HM say that he is partly to blame for playing the online game with them in the first place.

A girl in the 4th form speaks to her matron because she has shared a nude photo of herself with her ex-boyfriend. The ex-boyfriend is now threatening to show it to all of his friends. Her matron tells her that this happening because she should not have shared the image.

Indirect victim blaming:

A L6th student has just disclosed that she is being sexually harassed by an U6th boy to their tutor. The tutor responds by telling them what *they* should have done differently in that situation in order to keep themselves safe.

A student in the 5th form has been subject to online exploitation and, as a result, has lost £3000. His parents take away his phone every evening from 7pm to prevent this from happening again.

Challenging victim blaming

This should be done in a constructive and supportive way. The following steps will enable everyone who may be involved in an incident of child-on-child abuse to understand the impact of their words and actions.

- Remember the alleged victim lacks control in abusive situations – focus on the tactics or methods that the alleged perpetrator used to deceive or used to control the victim.
- Focus on the behaviour of the perpetrator all who abused the child or young person, not the behaviour of the victim; this puts the responsibility onto the person who has harmed the victim.
- Make time for learning and reflection. After every incident reflect on whether any victim blaming behaviours were identified and how to prevent them in future cases.